

Inspector General

United States
Department of Defense



DoD Needs to Improve Oversight of the Afghan
National Police Training/Mentoring and Logistics
Support Contract

Report Documentation Page			Form Approved OMB No. 0704-0188		
Public reporting burden for the collection of information is estimated to average 1 hour per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Washington Headquarters Services, Directorate for Information Operations and Reports, 1215 Jefferson Davis Highway, Suite 1204, Arlington VA 22202-4302. Respondents should be aware that notwithstanding any other provision of law, no person shall be subject to a penalty for failing to comply with a collection of information if it does not display a currently valid OMB control number.					
1. REPORT DATE 25 JUN 2013		2. REPORT TYPE		3. DATES COVERED 00-00-2013 to 00-00-2013	
4. TITLE AND SUBTITLE DoD Needs to Improve Oversight of the Afghan National Police Training/Mentoring and Logistics Support Contract			5a. CONTRACT NUMBER		
			5b. GRANT NUMBER		
			5c. PROGRAM ELEMENT NUMBER		
6. AUTHOR(S)			5d. PROJECT NUMBER		
			5e. TASK NUMBER		
			5f. WORK UNIT NUMBER		
7. PERFORMING ORGANIZATION NAME(S) AND ADDRESS(ES) Department of Defense Inspector General, 4800 Mark Center Drive, Alexandria, VA, 22350-1500			8. PERFORMING ORGANIZATION REPORT NUMBER		
9. SPONSORING/MONITORING AGENCY NAME(S) AND ADDRESS(ES)			10. SPONSOR/MONITOR'S ACRONYM(S)		
			11. SPONSOR/MONITOR'S REPORT NUMBER(S)		
12. DISTRIBUTION/AVAILABILITY STATEMENT Approved for public release; distribution unlimited					
13. SUPPLEMENTARY NOTES					
14. ABSTRACT					
15. SUBJECT TERMS					
16. SECURITY CLASSIFICATION OF:			17. LIMITATION OF ABSTRACT Same as Report (SAR)	18. NUMBER OF PAGES 81	19a. NAME OF RESPONSIBLE PERSON
a. REPORT unclassified	b. ABSTRACT unclassified	c. THIS PAGE unclassified			

Additional Copies

To obtain additional copies of this report, visit the Department of Defense Inspector General website at <http://www.dodig.mil/pubs/index.cfm>, or contact the Secondary Reports Distribution Unit at auditnet@dodig.mil.

Suggestions for Audits

To suggest or request audits, contact the Office of the Deputy Inspector General for Auditing at auditnet@dodig.mil or by mail:

Department of Defense Office of Inspector General
Office of the Deputy Inspector General for Auditing
ATTN: Audit Suggestions/13F25-04
4800 Mark Center Drive
Alexandria, VA 22350-1500

<p>DEPARTMENT OF DEFENSE</p> 	<p>To report fraud, waste, mismanagement, and abuse of authority.</p> <p>Send written complaints to: Defense Hotline, The Pentagon, Washington, DC 20301-1900 Phone: 800.424.9098 e-mail: hotline@dodig.mil www.dodig.mil/hotline</p>
--	--

Acronyms and Abbreviations

ACC-RI	Army Contracting Command-Rock Island
ACO	Administrative Contracting Officer
ANCOP	Afghan National Civil Order Police
ANP	Afghan National Police
CAR	Corrective Action Request
COR	Contracting Officer's Representative
CSTC-A	Combined Security Transition Command-Afghanistan
CTC	Central Training Center
DCMA	Defense Contract Management Agency
IJC	International Security Assistance Force Joint Command
MoI	Ministry of Interior
NTM-A	North Atlantic Treaty Organization Training Mission-Afghanistan
QAR	Quality Assurance Representative
RC	Regional Command
RTC	Regional Training Center
RRAD	Red River Army Depot
SOW	Statement of Work
TPSO	Training Program Support Office



INSPECTOR GENERAL
DEPARTMENT OF DEFENSE
4800 MARK CENTER DRIVE
ALEXANDRIA, VIRGINIA 22350-1500

June 25, 2013

**MEMORANDUM FOR DIRECTOR, DEFENSE CONTRACT MANAGEMENT
AGENCY
AUDITOR GENERAL, DEPARTMENT OF THE ARMY
COMMANDER, INTERNATIONAL SECURITY
ASSISTANCE FORCE/U.S. FORCES-AFGHANISTAN**

**SUBJECT: DoD Needs to Improve Oversight of the Afghan National Police
Training/Mentoring and Logistics Support Contract
(Report No. DODIG-2013-093)**

We are providing this report for review and comment. The Defense Contract Management Agency (DCMA), Combined Security Transition Command-Afghanistan (CSTC-A), and Army contracting officials need to improve oversight of the DoD Afghan National Police (ANP) contract, valued at \$1.2 billion. DCMA personnel did not coordinate oversight processes and procedures with program or contracting personnel, implement quality assurance requirements considered critical for mission success, review oversight documentation, and properly train contracting officer's representatives (CORs). Furthermore, U.S. Forces-Afghanistan and DCMA officials did not have an adequate fielded mentor oversight strategy to overcome the challenges of providing oversight in Afghanistan. In addition, CSTC-A developed a memorandum of agreement with Red River Army Depot to hire CORs for the ANP contract; however, the memorandum did not identify appropriate COR qualifications. We considered management comments on a draft of this report when preparing the final report. This is the second in a series of reports on the DoD ANP contract.

DoD Directive 7650.3 requires that recommendations be resolved promptly. We received comments from Acting Commander, DCMA-International; the Deputy Commanding General, CSTC-A; the Commander, Army Contracting Command; and the Inspector General at the International Security Assistance Force Joint Command. The comments from the Acting Commander, DCMA-International, on Recommendations B.1 and B.2.d were partially responsive. Therefore, we request additional comments from the Commander, DCMA-Afghanistan, on these recommendations by July 25, 2013. We considered comments from the Acting Commander, DCMA-International; Deputy Commanding General, CSTC-A; the Commander, Army Contracting Command; and the Inspector General, International Security Assistance Force Joint Command on Recommendations A.1.a, A.1.b, A.1.c, A.2.a, A.2.b, B.2.a, B.2.b, B.2.c, B.2.e, C.1, C.2.a, C.2.b, C.2.c, C.2.d, D.1, and D.2 responsive.

If possible, send a Microsoft Word (.doc) file and portable document format (.pdf) file containing your comments to audacm@dodig.mil. Copies of your comments must have the actual signature of the authorizing official for your organization. We are unable to accept the /Signed/ symbol in place of the actual signature. If you arrange to send classified comments electronically, you must send them over the SECRET Internet Protocol Router Network (SIPRNET).

We appreciate the courtesies extended to the staff. Please direct questions to me at (703) 604-9077 (DSN 664-9077).


Jacqueline Wicecarver
Assistant Inspector General
Acquisition and Contract Management

cc:

Under Secretary of Defense for Acquisition, Technology, and Logistics
Assistant Secretary of the Army for Acquisition, Logistics, and Technology
Commander, U.S. Central Command
Commander, International Security Assistance Force Joint Command
Commander, North Atlantic Treaty Organization Training Mission-
Afghanistan/Combined Security Transition Command-Afghanistan
Director, Acquisition Resources and Analysis
Director, Defense Procurement Acquisition Policy
Executive Director, Army Contracting Command-Rock Island



Results in Brief: DoD Needs to Improve Oversight of the Afghan National Police Training/Mentoring and Logistics Support Contract

What We Did

We determined whether the Army, North Atlantic Treaty Organization Training Mission-Afghanistan (NTM-A)/Combined Security Transition Command-Afghanistan (CSTC-A), and the Defense Contract Management Agency (DCMA) had adequate oversight processes and procedures for the Afghan National Police (ANP) contract and whether DoD conducted adequate surveillance of the contract, valued at approximately \$1.2 billion. This is the second in a series of audits on the ANP contract.

What We Found

DCMA, NTM-A/CSTC-A, and Army officials did not implement adequate oversight of the ANP contract. This occurred because DCMA did not coordinate oversight procedures with program or contracting personnel and did not implement quality assurance requirements that DCMA management considered critical to mission success.

Contracting officer's representatives (CORs) for the ANP contract did not conduct effective contractor oversight. This occurred because DCMA personnel did not review COR audit checklists, provide CORs feedback on completed audit checklists, or train CORs on oversight responsibilities.

DCMA and International Security Assistance Force Joint Command officials did not perform adequate oversight of fielded mentors for the ANP contract. This occurred because quality assurance representatives (QARs) did not always provide training and followup on audit checklists received from the CORs.

NTM-A/CSTC-A and Red River Army Depot (RRAD) personnel nominated six CORs we interviewed who were not effectively providing oversight of the ANP contract. This occurred because NTM-A/CSTC-A personnel developed a memorandum of agreement with RRAD that did not identify appropriate COR qualifications. As a result, contractor performance at ANP training sites where the six RRAD CORs were appointed was not adequately measured and assessed.

In addition, the Army could not determine whether the contractor fully delivered \$439 million in services or provided effective training of the ANP.

What We Recommend

The Commander, DCMA-Afghanistan, should:

- review the prior lead QAR's and the prior QAR's performance and hold them accountable for deficient performance as appropriate;
- establish a quality control process to verify oversight was performed; and
- establish a clear reporting strategy for fielded mentor COR oversight.

The contracting officer at Army Contracting Command-Rock Island should coordinate with DCMA to determine whether the oversight strategy was appropriate and implement a strategy to consistently review contractor internal corrective action requests.

The Commander, U.S. Forces-Afghanistan should establish and implement an effective fielded mentor oversight strategy.

The NTM-A/CSTC-A, Director of Contract Management and Oversight, should rescind the memorandum of agreement with RRAD and nominate CORs who have prior quality assurance experience.

Management Comments and Our Response

Comments from the Inspector General, International Security Assistance Force Joint Command, responding for the Commander, U.S. Forces-Afghanistan; the Deputy Commanding General, CSTC-A, responding for the NTM-A/CSTC-A, Director of Contract Management and Oversight and the Director of the Training Program Support Office; and the Commander, Army Contracting Command, responding for the Contracting Officer at Army Contracting

Command-Rock Island were responsive, and no further comments are required.

The Acting Commander, DCMA-International, responded for the Commander, DCMA-Afghanistan, and agreed with the recommendations to review the performances of the prior lead QAR and the prior QAR, to establish a quality control process to verify required oversight was performed, and to establish a clear reporting strategy for fielded mentor COR oversight. We request additional comments from the Commander, DCMA-Afghanistan on Recommendation B.1 to update the Theater Quality Plan to specify that supporting documentation should be included when an audit cannot be performed, and on Recommendation B.2.d regarding how Phase II training will be conducted. Please see the Recommendations Table on the next page.

Recommendations Table

Management	Recommendations Requiring Comment	No Additional Comments Required
Commander, U.S. Forces-Afghanistan		C.1
Commander, Defense Contract Management Agency-Afghanistan	B.1, B.2.d	A.1.a, A.1.b, A.1.c, B.2.a, B.2.b, B.2.c, B.2.e, C.2.a, C.2.b, C.2.c, C.2.d
North Atlantic Treaty Organization Training Mission-Afghanistan/Combined Security Transition Command-Afghanistan, Director of Contract Management and Oversight		D.1
North Atlantic Treaty Organization Training Mission-Afghanistan/Combined Security Transition Command-Afghanistan, Director of the Training Program Support Office		D.2
Contracting Officer, Army Contracting Command-Rock Island		A.2.a, A.2.b

Please provide comments by July 25, 2013.

Table of Contents

Introduction	1
Objectives	1
Background	1
Review of Internal Controls	3
Finding A. Contract Oversight Needs Improvement	4
Statement of Work Requirements Omitted From Audit Checklists Contractor's Program Management Office and Logistics Warehouse Needed Oversight	5 7
Audit Checklists Needed Updating as Requirements Changed	8
CORs Not Provided Tools to Perform Oversight	9
Consistent Oversight Needed at Training Sites	11
Contractor Did Not Address Internal Corrective Action Requests	12
Communication Required Between Oversight Personnel, Requirement Owners, and Contracting Office	14
Critical Quality Assurance Requirements Must Be Implemented	15
Conclusion	16
Recommendations, Management Comments, and Our Response	16
Finding B. Incomplete Audit Checklists Hinder Contractor Oversight	21
Audit Checklists Were Not Completed in Accordance With Guidance	21
Inadequate Review and Lack of Feedback on COR Audit Checklists	25
Training CORs to Monitor Contractor Performance	26
Conclusion	28
Recommendations, Management Comments, and Our Response	28
Finding C. Improved Oversight of the Fielded Mentors Needed	32
COR Nomination and Appointment	32
Fielded Mentor CORs Completion of Audit Checklists	34
Need to Develop an Oversight Strategy for Fielded Mentors	37
QARs Need to Provide Training and Review Audit Checklists for Fielded Mentor Services	38 38
Conclusion	39
Recommendations, Management Comments, and Our Response	39
Finding D. Red River Army Depot CORs Were Not Providing Effective Oversight	43
COR Memorandum of Agreement	43
COR Nomination Process	43
Nominated and Appointed CORs Were Ineffective	43

Table of Contents (cont'd)

CORs Needed to Be Better Qualified	44
Conclusion	45
Recommendations, Management Comments, and Our Response	45
Appendixes	
A. Scope and Methodology	47
Use of Computer-Processed Data	48
Use of Technical Assistance	48
Prior Coverage	48
B. Monthly Oversight Performed at Sites Visited	50
C. Map of ANP Training Sites and Fielded Mentor Regions	51
D. Regional Command-Southwest Oversight Personnel and COR Appointment Status	52
Management Comments	
International Security Assistance Force Joint Command	53
Defense Contract Management Agency-International	55
Combined Security Transition Command-Afghanistan	62
Army Contracting Command	65

Introduction

Objectives

The overall audit objective was to determine whether DoD officials were using appropriate contracting processes to satisfy mission requirements and were conducting appropriate oversight of the Afghan National Police (ANP) contract in accordance with Federal and DoD policies. For this audit, we determined whether the Army, North Atlantic Treaty Organization Training Mission-Afghanistan (NTM-A)/Combined Security Transition Command-Afghanistan (CSTC-A), and the Defense Contract Management Agency (DCMA) had adequate oversight processes and procedures for the contract. Additionally, we determined whether the Army, NTM-A/CSTC-A, and DCMA conducted adequate contractor surveillance.

This audit is the second in a series of audits on the ANP training/mentoring and logistics support contract. We reported on the adequacy of contract administration in Report No. DODIG-2012-094, “Afghan National Police Contract Requirements Were Not Clearly Defined but Contract Administration Improved,” May 30, 2012.

Background

Army Contracting Command-Aberdeen Proving Ground officials awarded the Afghan Ministry of Interior (MoI) and ANP training/mentoring and logistics support contract (the ANP contract), W91CRB-11-C-0053, valued at approximately \$1 billion, to DynCorp International, LLC (DynCorp), on December 20, 2010. The ANP contract was a cost-plus-fixed-fee contract that included a 120-day transition period for the contractor to become fully operational, a 2-year base period, and a 1-year option period. On May 1, 2011, the ANP contract became fully operational, and Army Contracting Command-Rock Island (ACC-RI) assumed ANP contract management responsibilities for all new contracting actions. However, Army Contracting Command-Aberdeen Proving Ground officials did not formally transfer the contract administration responsibilities through a contract modification to ACC-RI until August 31, 2011. At the time of contract transfer, the contract value had increased by approximately \$145.3 million. As of September 28, 2012, the total estimated contract value was approximately \$1.2 billion.

The purpose of the contract was to assist the Afghanistan government in building, developing, and sustaining an effective and professional law enforcement organization. The contract required mentorship and training aimed at enhancing public security, MoI and ANP morale, and public perception of the ANP. Specifically, the contractor was required to support the MoI/ANP training program by delivering classroom instruction, delivering “on-the-job” mentoring (post-classroom), and providing comprehensive logistics and life support at various facilities throughout Afghanistan. The goal of the program was to train and mentor the Afghans to manage all aspects of ANP training within 2 years of contract award.

Statement of Work

The ANP base contract included a general statement of work (SOW) outlining the contractor's program management requirements. The ANP contract also included two SOW attachments outlining other contract requirements. One attachment outlined the requirements for training and mentoring services at MoI and ANP locations throughout Afghanistan. The other outlined the basic life support and force protection services the contractor was required to provide at the regional training centers and training support sites, including base security, food service, housing, cleaning, and medical services.

Responsible Organizations

Multiple North Atlantic Treaty Organization and DoD Components were responsible for providing oversight of the MoI/ANP training program. Under the Commander, International Security Assistance Force/U.S. Forces–Afghanistan, two subordinate commands were responsible for supporting ANP development, training, and sustainment: NTM-A/CSTC-A and the International Security Assistance Force Joint Command (IJC). NTM-A/CSTC-A was responsible for building MoI capacity and training, mentoring, and equipping the ANP. IJC conducted joint security and stability operations to improve the effectiveness of the ANP. Within NTM-A/CSTC-A, two key officials, the Deputy Commander, Police and the Deputy Commanding General for Support were responsible for supporting the mentoring, training, and equipping of ANP forces.

Under the Deputy Commanding General for Support, the Training Program Support Office (TPSO) executed and managed the ANP contract. TPSO was responsible for providing program management and oversight of the ANP training contract and coordinating with DCMA-Afghanistan for execution and oversight of the contract.

Contract Oversight

The contracting officer delegated contract administration responsibilities for the ANP contract to DCMA-Afghanistan in February 2011. DCMA-Afghanistan's contract oversight responsibilities included ensuring contractor compliance with contractual quality assurance requirements, ensuring timely submission of required reports, appointing contracting officer's representatives (CORs), and having monthly contact with the CORs. DCMA created a Theater Quality Plan to provide guidance for CORs and personnel providing oversight of contracts in Afghanistan.

The DCMA lead quality assurance representative (lead QAR) was responsible for oversight of personnel implementing the requirements in the Theater Quality Plan. The lead QAR was also responsible for requiring the ANP contract QARs and CORs to use the proper audit checklists, recommending changes and updates to the audit checklists, and verifying that the QARs reviewed and analyzed audit checklist and corrective action request (CAR) data to evaluate contractor performance.

The Theater Quality Plan stated that the QAR was required to routinely work with other DCMA staff, contractor personnel, CORs, and the requirements owners. The QAR responsibilities included providing oversight as assigned, submitting the completed audit

checklist to the appropriate DCMA-Afghanistan e-mail address within 3 days of completion, performing monthly data analysis of audit checklists and CARs, coordinating with the administrative contracting officer (ACO) and lead QAR to identify COR requirements and deficiencies, providing DCMA COR training, conducting an initial joint validation audit checklist with the COR as part of the process for the COR's initial appointment; mentoring CORs, and evaluating and approving COR audit checklists to establish that DCMA quality standards were met.

The Theater Quality Plan required that CORs be designated in accordance with subsection 201.602-2 of the Defense Federal Acquisition Regulation Supplement and authorized in writing by the ACO to perform contract administrative functions and oversight of contractor performance. The COR responsibilities included performing duties in accordance with the COR appointment letter, Theater Quality Plan, and the DCMA-Afghanistan COR Management Guide; monitoring contractor performance by using DCMA surveillance audit checklists provided by the QAR; forwarding all completed audit checklists to the QAR; and interacting with the QAR to identify and document contractor performance problems.

Oversight of Fielded Mentors

The ANP contract required the contractor to provide fielded mentors to conduct training and mentoring operations in support of the ANP mentoring teams. The fielded mentors, who provided on-the-job training and guidance to ANP mentoring teams, were required to live, sleep, and eat with the teams.

IJC was responsible for nominating military personnel as fielded mentor CORs to provide oversight of the contractor fielded mentors. IJC officials, independent of NTM-A/CSTC-A, had military personnel as CORs because IJC was the requirements owner for the fielded mentor positions.

Review of Internal Controls

DoD Instruction 5010.40, "Managers' Internal Control Program (MICP) Procedures," July 29, 2010, requires DoD organizations to implement a comprehensive system of internal controls that provides reasonable assurance that programs are operating as intended and to evaluate the effectiveness of the controls. We identified internal control weaknesses within DCMA-Afghanistan, ACC-RI, NTM-A/CSTC-A, and IJC. Specifically, DCMA-Afghanistan officials did not provide CORs with complete oversight guidance and audit checklists, maintain oversight of all ANP training contract requirements, and implement DCMA quality assurance criteria. Furthermore, DCMA and ACC-RI officials did not coordinate to create an effective oversight strategy for the ANP contract. DCMA officials also did not coordinate oversight processes or update audit checklists with input from NTM-A/CSTC-A program personnel. In addition, DCMA-Afghanistan personnel and IJC officials did not consistently nominate and appoint CORs to provide oversight of the contractor fielded mentors and did not have an adequate fielded mentor oversight strategy in place. We will provide a copy of the report to the senior official responsible for internal controls in DCMA-Afghanistan, ACC-RI, and NTM-A/CSTC-A.

Finding A. Contract Oversight Needs Improvement

DCMA, NTM-A/CSTC-A, and ACC-RI officials did not implement adequate oversight procedures for the ANP contract. Specifically, DCMA officials did not:

- include portions of all 22 sections of the SOWs in the audit checklist used to perform oversight of the ANP contract,
- maintain oversight of the contractor's program management office or the ANP logistics warehouse,
- provide timely updates to the 11 ANP audit checklists¹ based on modifications to the contract SOW and DCMA oversight criteria,
- provide 8 of the 10 CORs we interviewed with the proper audit checklists or require the CORs to complete the required audit checklists,
- maintain consistent oversight at the 12 ANP training locations² where we reviewed audit checklists, or
- validate that the contractor resolved internal CARs in a timely manner.

This occurred because DCMA personnel did not:

- coordinate with the NTM-A/CSTC-A program management personnel, requirements owners, or ACC-RI contracting personnel when generating or updating audit checklists;
- coordinate oversight procedures with ACC-RI contracting personnel during the contracting process; and
- implement the quality assurance requirements for oversight in Afghanistan that DCMA considered critical to mission success.

As a result, ACC-RI could not determine whether the contractor fully delivered services worth \$439 million³ included in the ANP contract. Additionally, the ACC-RI contracting officer would not be able to determine whether the contractor provided effective training for the ANP, which could affect the Afghan National Security Forces capabilities in leading security operations throughout Afghanistan.

¹ There were 11 COR audit checklists, which included 7 trainer/mentor audit checklists, 1 trafficking in persons checklist, 1 force protection audit checklist, and 2 life support services audit checklists. CORs were required to complete different audit checklists depending on the contractor services provided at their assigned location.

² As of October 2012, there were 25 training locations. The number of training sites was reduced as the sites were closed or transitioned to Afghan control.

³ The \$439 million in services was the total charged on invoices for the contract as of September 2012.

Statement of Work Requirements Omitted From Audit Checklists

The lead QAR did not include portions of all 22 sections of the SOWs in the audit checklists used by the QARs and CORs to perform oversight of the ANP contract. The DCMA Theater Quality Plan, signed by the Commander of DCMA-Afghanistan in December 2011, states that the lead QAR is responsible for requiring the QARs and CORs to use the proper audit checklists and for recommending changes and updates to the audit checklists. Additionally, the QAR assigned to the ANP contract is responsible for determining whether the contractor complied with contract requirements. The lead QAR did not create audit checklists that completely covered either of the 2 overall requirements in the life support services SOW or portions of 20 overall requirements in the trainer/mentor services SOW. DCMA personnel stated that the lead QAR and QAR analyzed the SOWs to determine which SOW requirements to include in the audit checklists. However, DCMA was unable to provide any documentation explaining how the analysis was done or why certain SOW requirements were omitted from the checklists.

The life support services SOW included the ANP contract requirements for basic life support, security, and food service operations at the ANP training sites. The lead QAR did not include all of the life support SOW requirements in the COR audit checklists.

For example, section 3.1 of the security section of the life support services SOW required the contractor to:

Man open ECPs [Entry Control Points] and maintain installation security. Searching personnel and vehicles entering and leaving the installations to deny the introduction of unauthorized weapons or contraband, to prevent theft of GIRoA [Government of the Islamic Republic of Afghanistan] and U.S. Government property and to ensure only authorized personnel gain access. Manning shall be at a sufficient level to enable the operation of all access denial barriers, overmatch locations, search locations, and other control measures in place for ECPs.

However, the force protection services audit checklist the CORs were required to complete did not include reviewing this entry control point security requirement. DCMA officials did not have assurance that the training sites were secure because the CORs were not required to provide oversight of contractor performance for access to ANP training facilities.

Additionally, the basic life support section of the life support services SOW stated:

Health and welfare inspections shall be performed to ensure all edifices on facilities are safe, in working order, and properly maintained. Should, at any time, during these inspections illegal or unauthorized substances, equipment, or items be found, they shall be reported to the Security Manager and COR for action.

However, the basic life support audit checklist did not include reviewing the health and welfare inspection requirement. Therefore, DCMA officials were not informed about health and safety problems that existed at the ANP training sites. For example, during

our site visit to Regional Training Center (RTC) Kandahar, the COR stated that gasoline containers had been improperly stored at the training site. Although the COR identified the improper storage and had the contractor correct the deficiency, the basic life support checklist did not prompt the COR to make note of the improper fuel storage.

The trainer/mentor services SOW provided the contract requirements for developing, supporting, and increasing the capabilities of the ANP forces and the Afghan MoI. The SOW for command mentoring included contractor mentoring services at Central Training Center (CTC) Kabul and RTCs Helmand, Herat, Konduz, and Mazar-e-Sharif. However, the lead QAR did not include all command mentoring requirements in the audit checklist. For example, the DCMA audit checklist did not include requirements to:

- assess whether the contractor assigned the students to appropriate class sizes;
- evaluate whether the contractor coordinated with the site command regarding the number of police to be trained or the type of training;
- observe whether the contractor assisted the Afghan financial and logistics managers in developing contracts for supplies, equipment, and services; or
- review whether the contractor evaluated the Afghan commanders' understanding of training management.

Therefore, DCMA could not determine whether the contractor fully performed all command mentor requirements at each training site.

Not every audit checklist item applied at every site, which caused confusion when the CORs completed their audit checklists. For example, the training adviser audit checklist included assessing whether the contractor met the

Not every audit checklist item applied at every site, which caused confusion when the CORs completed their audit checklists.

requirements from the training adviser section of the trainer/mentor services SOW. Specifically, the audit checklist included the question, "Does the contractor provide 11 female trainers to properly train the Women's Police Corps Program of Instruction students at the Regional Training Centers?" However, not all of the training sites where the CORs were assigned to complete the training adviser audit checklist⁴ had Women's Police Corps training. Furthermore, the 11 required trainers was a contract-wide requirement, not specific to one Women's Police Corps training site. Therefore, the CORs were not able to sufficiently answer this question because the audit checklist did not specify to whom the requirement applied.

⁴ Of the 12 training sites where the audit team reviewed audit checklists, the training adviser audit checklist was required to be completed by the CORs at RTCs Kandahar, Konduz, Jalalabad, Mazar-e-Sharif, O-4 Compound, and Training Sustainment Site-Lonestar.

Contractor's Program Management Office and Logistics Warehouse Needed Oversight

DCMA officials did not maintain oversight of the contractor's program management office or the ANP logistics warehouse. Specifically, the lead QAR and the QAR assigned to the ANP contract did not develop an audit checklist and did not assign a COR oversight responsibilities for the contractor's program management office or the ANP logistics warehouse in Kabul. The basic contract included a contract line item number for the program management office and outlined general program management requirements.

According to the ANP contract, the contractor-operated program management office in Kabul was required to provide administrative, management, logistical, and other support to the ANP training sites throughout Afghanistan. DCMA personnel had no assurance that the contractor was adequately managing contract requirements in-theater without oversight of the program management office. Some of the audit checklists included questions about work that should have been performed at the program management office; however, the CORs were only responsible for oversight at their assigned training sites and could not answer the questions about the program management office.

For example, the force protection services audit checklist included questions that required the COR at each training site to review whether the contractor had conducted background checks, had a DNA sample, and had completed a screening process before hiring Afghans to work at the training centers. The contractor's program management office in Kabul maintained background check and DNA information. The CORs at the training centers were not able to review whether the contractor adequately vetted Afghan employees, and there was no Government oversight of the contractor program management office. As a result, there was no direct oversight of whether the contractor hired Afghan personnel who would be a threat to security at the training sites. The lead QAR should develop and implement an oversight strategy for the contractor's program management office to validate that the contractor provides proper contract management support and administration.

There was no Government oversight of the contractor program management office.

Contractor personnel at the ANP logistics warehouse were responsible for distributing Government-purchased supplies to ANP training sites. DCMA personnel did not develop an audit checklist that addressed contractor responsibilities and did not assign a COR to provide oversight at the ANP logistics warehouse. DCMA officials had no assurance that the contractor adequately secured, managed, and tracked Government-purchased supplies in-theater or that the contractor maintained required inventories without oversight of the ANP logistics warehouse. The lead QAR should provide oversight of the logistics warehouse to determine whether the contractor maintained accurate and complete inventories, and whether the contractor properly secured, managed, and tracked Government-purchased supplies.

Audit Checklists Needed Updating as Requirements Changed

The lead QAR did not provide timely updates to the 11 ANP audit checklists based on modifications to the contract SOW and DCMA criteria. The lead QAR stated that the QAR assigned to the ANP contract was responsible for updating the audit checklists and the lead QAR would then verify the updated audit checklists. However, the DCMA Theater Quality Plan stated that the lead QAR was responsible for recommending changes and updates to the audit checklists.

Audit Checklists Not Updated to Reflect Statement of Work Modifications

ANP training sites continuously closed or transferred to the Afghans as the Afghan National Security Forces took on additional responsibilities for security and police training. When an ANP training site closed, the contracting officer issued a notice to proceed, directing the contractor to stop work at that training site. The contracting officer, with assistance from NTM-A/CSTC-A personnel, would subsequently modify the contract to include all notices to proceed that were issued since the previous SOW modification.

The lead QAR did not update the audit checklists in a timely manner after the contracting officer issued SOW modifications. For example, the contracting officer issued an updated trainer/mentor services SOW in December 2011. However, the lead QAR did not update the audit checklists to reflect the December 2011 SOW modification until March 2012, and the QAR did not provide the CORs with the updated audit checklists until April 2012. Therefore, the CORs for the ANP contract used an outdated audit checklist for 4 months. Additionally, even after the lead QAR updated the audit checklists, the checklists did not include all of the SOW changes, and requirements deleted from the SOW based on notices to proceed were not deleted from updated COR audit checklists. In another example, the trainer/mentor audit checklists included three questions regarding whether the contractor provided the ANP judicial security unit with training; however, the updated SOW no longer included the judicial security unit requirement.

In some cases, although the lead QAR had updated the audit checklists, the QAR assigned to the ANP contract still provided outdated audit checklists to the CORs. One COR we interviewed used an audit checklist drafted by DCMA in November 2011 to conduct oversight in May 2012. The lead QAR updated the audit checklist in March 2012 to reflect the December 2011 SOW. However, the QAR assigned to the ANP contract did not provide the COR the updated audit checklist until June 2012, 3 months after the lead QAR updated the audit checklist and 6 months after the contracting officer modified the SOW. Since the audit checklists did not adequately reflect the SOW, the CORs could not adequately assess the contractor on current requirements or were assessing the contractor on a requirement that was no longer included in the ANP contract.

Audit Checklists Must Match DCMA Guidance

The lead QAR did not provide the CORs with audit checklists that complied with the Theater Quality Plan. The audit checklists used by the CORs through March 2012 did not include the requirements outlined in the DCMA Theater Quality Plan regarding how the COR should complete the audit checklist. For example, the DCMA Theater Quality Plan stated, “if ‘yes’ is checked on any questions in the body of the checklist, comments are required detailing what was evaluated, where, and in what manner.” However, the COR audit checklists stated, “YES = requirement performed satisfactory. [The COR] may comment when key observations are noted.” Additionally, the DCMA COR Management Guide stated the QAR was responsible for reviewing all COR audit checklists for completeness and approving audit checklists to ensure the CORs met DCMA quality standards.

The QAR assigned to the ANP contract did not require the CORs to meet DCMA quality standards when completing the audit checklist. The CORs did not always include comments in their audit checklists when they answered a question “yes,” and the guidance included in the

The QAR assigned to the ANP contract did not require the CORs to meet DCMA quality standards when completing the audit checklist.

audit checklist did not require them to do so. The QAR would accept the COR audit checklist with no comments and would include the audit checklist in the DCMA audit checklist repository as if it met DCMA requirements. For example, in January 2012, the COR at RTC Kandahar answered the audit checklist question, “Does the contractor provide all required transportation as well as not permitting privately owned vehicles onto the property?” with a “yes” response, but did not provide any comments regarding what he evaluated and in what manner. Although the Theater Quality Plan required an explanation for a “yes” checklist response, the RTC Kandahar audit checklist for January 2012 indicated the COR may comment when key observations were noted. However, the COR did not provide comments. The QAR assigned to the ANP contract should have required the COR to provide comments when he reviewed the audit checklists.

The Theater Quality Plan stated documentation of contractor conformance or nonconformance with contract requirements was essential to sustaining desired contractor performance. However, the lead QAR and QAR assigned to the ANP contract could not effectively evaluate whether the contractor conformed to the contract requirements if the COR did not properly document responses to audit checklist questions.

CORs Not Provided Tools to Perform Oversight

The lead QAR and QAR assigned to the ANP contract did not provide CORs with the proper audit checklists and supporting documentation or require the CORs to complete the required audit checklists. The DCMA Theater Quality Plan stated the lead QAR was responsible for requiring the QARs and CORs to use the proper audit checklists. The QAR assigned to the ANP contract stated that he was responsible for providing the CORs with the audit checklists when the CORs were assigned to an ANP training site.

Additionally, according to the DCMA COR Management Guide, the QAR was responsible for providing the COR with a review of the important requirements in the SOW.

The QAR assigned to the ANP contract did not provide 8 of the 10 CORs we interviewed with the audit checklists required to be completed at their assigned training sites, a copy of the SOW, or the most up-to-date version of the SOW prior to arriving at their oversight location. For example, the QAR did not provide the COR at RTC Helmand with the trainer/mentor services audit checklist that addressed contractor services provided for logistics mentoring during 2 consecutive months. The QAR provided the COR with a different trainer/mentor services audit checklist, which did not apply to the work the contractor performed at RTC Helmand.

Furthermore, the QAR did not provide the COR at RTC Herat with the trainer/mentor services audit checklist and did not direct the COR to perform training oversight. The QAR provided the COR at RTC Herat with the required trainer/mentor services audit checklist and informed the COR of his oversight duties after we told the lead QAR and QAR there was a gap in oversight coverage. In another example, the QAR did not provide the COR at CTC Kabul with the trainer/mentor services audit checklist for the training that occurred at that site, and therefore, the COR did not know training oversight was required.

The QAR did not provide the COR at RTC Herat with the trainer/mentor services audit checklist and did not direct the COR to perform training oversight.

The trainer/mentor audit checklists stated, “a copy of the SOW must accompany this checklist.” However, the QAR assigned to the ANP contract did not provide the CORs at RTC Gardez and Training Sustainment Site-Lonestar a copy of the required audit checklists or a copy of the contract SOW prior to those CORs arriving at their assigned oversight locations. We provided the COR at RTC Gardez a copy of the SOW, and the COR at RTC Gardez subsequently provided the SOW to the COR at Training Sustainment Site-Lonestar. Without a copy of the SOW, the CORs were not aware of all of the training requirements in the ANP contract.

DCMA personnel provided three other CORs with copies of outdated SOWs. For example, the QAR provided the COR assigned oversight of the trainer/mentor services at the Afghan MoI with a February 2011 version of the SOW. However, the most up-to-date SOW when the COR was assigned MoI oversight was dated December 2011. As a result, DCMA personnel did not provide complete oversight of the ANP services conducted at those sites because the CORs were not provided the correct SOW to use to evaluate whether the contractor was meeting contract requirements.

The DCMA COR Management Guide and Theater Quality Plan state that the QAR is required to maintain records and manage and mentor CORs. However, the QAR assigned to the ANP contract did not provide 7 of the 10 CORs we interviewed with copies of audit checklists that were completed by the prior CORs at the sites they were

assigned. Without copies of the previous COR audit checklists, the CORs were not able to identify systemic performance issues and other contract nonconformances previously identified at the ANP training sites. The lead QAR stated that all completed audit checklists were kept in a DCMA central electronic filing system. Therefore, DCMA personnel could have provided prior audit checklists to new CORs so that the new CORs were aware of past contract nonconformances at their assigned training site. The QAR assigned to the ANP contract should provide the CORs with the necessary oversight documentation that applies to the training sites the CORs are assigned, as required by the Theater Quality Plan and COR Management Guide.

Consistent Oversight Needed at Training Sites

DCMA officials did not maintain consistent oversight at the 12 ANP training sites where we reviewed audit checklists. Specifically, the lead QAR did not coordinate with the QAR and the ACO to fill COR vacancies at ANP training sites where no COR was assigned and no oversight was provided. The Theater Quality Plan required the lead QAR, QAR, and ACO to coordinate and identify COR requirements and deficiencies. The Theater Quality Plan also stated that the QAR should complete an audit checklist by contacting requirements owners and reviewing contract documentation for those training sites where an onsite audit cannot be performed. However, the lead QAR, QAR, and ACO allowed gaps in oversight at several ANP training locations where no QAR or COR oversight occurred for 2 or more months.

The lead QAR, QAR, and ACO allowed gaps in oversight at several ANP training locations where no QAR or COR oversight occurred for 2 or more months.

Of the 12 sites where we reviewed audit checklists, 4 had oversight gaps of 2 or more months for the 6-month period from January 2012 through June 2012.⁵ For example, there was no COR at RTC Bamiyan for 5 consecutive months from February 2012 through June 2012. Personnel from TPSO performed a site visit and completed one audit checklist in May 2012. However, no COR was permanently assigned onsite, and TPSO personnel did not revisit RTC Bamiyan to complete any additional audit checklists. When we visited RTC Bamiyan, onsite Army personnel identified a potential COR who could perform oversight duties and had completed the required COR training. When notified, DCMA personnel did not take action to nominate and appoint this person as the COR at RTC Bamiyan.

According to the ANP contract, the contractor was required to perform trainer/mentor services at RTC Herat. However, a COR at RTC Herat did not submit a trainer/mentor audit checklist from January through March 2012 despite being onsite full time. The COR was notified by the QAR assigned to the ANP contract that he had to complete a trainer/mentor audit checklist in February 2012. However, the QAR took no further action, the lack of trainer/mentor oversight continued, and the COR redeployed in March 2012.

⁵ See Appendix B for monthly oversight performed at the sites we visited.

Additionally, DCMA did not assign a COR to CTC Kabul for 3 consecutive months. The lead QAR and the QAR assigned to the ANP contract were located at a U.S. installation in Kabul, and although the training site was also in Kabul, the QAR did not travel to CTC Kabul to perform an oversight audit. As a result, no Government oversight was performed from February through April 2012.

The DCMA Theater Quality Plan stated, “Quality Assurance (QA) oversight is critical to contract administration and ultimately mission success.” However, if DCMA had COR vacancies, and the QAR did not perform oversight at training sites where there were no CORs, then DCMA did not perform the required quality assurance oversight. The lead QAR, QAR, and ACO should coordinate to identify and fill COR vacancies in a timely manner so that oversight gaps of 2 or more months do not occur.

Contractor Did Not Address Internal Corrective Action Requests

DCMA officials did not validate that the contractor resolved internal CARs⁶ in a timely manner. The Theater Quality Plan states that a level II CAR must be issued when a contractual nonconformance cannot be corrected on the spot or is considered systemic, unless a contractor internal CAR was previously issued on the nonconformance. The Director, Quality Assurance, DCMA-Afghanistan, and the lead QAR stated that DCMA would not issue a CAR if the contractor had an open internal CAR for the same contract nonconformance. According to the contractor’s internal CAR log provided by ACC-RI, as of June 30, 2012, there were 21 internal CARs open for more than 3 months without resolution, and 14 of those 21 internal CARs were open for more than 1 year. For example:

- The contractor issued an internal CAR because there was no hazardous waste removal from RTC Helmand. The hazardous waste was being burned onsite. The internal CAR for hazardous waste was issued in December 2011 and remained open for 6 months.
- One internal CAR identified improper grounding procedures, damaged cables, and equipment and wiring that was damaged and led to unsafe conditions at RTC Kandahar. The internal CAR remained open for over a year. DCMA issued CARs for electrical safety issues at RTC Kandahar in August and November 2012; however as of January 2013, all of the electrical issues at RTC Kandahar remained unresolved.

⁶ CARs document contractual nonconformance. A level I CAR is a nonconformance that can be corrected by the contractor “on the spot.” A level II CAR is a contract nonconformance that cannot be corrected “on the spot” or is considered a systemic issue. A level III CAR is a serious contract nonconformity. The contractor issued internal CARs when the contractor’s quality assurance personnel identified contract nonconformance or other issues.

- A contract-wide internal CAR issued in February 2012 identified the contractor did not have a Government-approved automated accounting system to monitor inventory and spending. This internal CAR remained open for 4 months.

Furthermore, the COR at RTC Helmand stated the contractor had several internal CARs that were open for more than 4 months related to electrical grounding and hazardous material disposal procedures, and as a result, he could not recommend that DCMA issue a CAR for the nonconformance. For example, the COR stated the contractor did not have proper tools to ground electrical systems; however, he was unable to request that the QAR issue a Government CAR for the grounding equipment because the contractor issued an internal CAR. During our visit to RTC Helmand in May 2012, we observed exposed wiring that, if not properly grounded, could put personnel and equipment at risk (see Figure 1). DCMA personnel stated they had no formal way to require the contractor to fix contract issues identified by the contractor because DCMA did not issue CARs when the contractor had already issued an internal CAR. However, in July 2012, after discussions with ACC-RI contracting personnel, DCMA officials issued a CAR against the contractor's quality control plan and internal CARs open for more than 30 days. At that time, DCMA issued a CAR for the electrical grounding tools at RTC Helmand; however, the CAR was not closed until January 2013. The Commander, DCMA-Afghanistan, should direct the lead QAR to require the contractor to address all outstanding CARs and internal CARs related to contract health and safety requirements immediately and to address any new CARs or internal CARs related to contract health and safety requirements within 30 days of identification.

Figure 1. Exposed Wiring at RTC Helmand



Note: Red boxes indicate exposed cables.

Source: DoD Office of Inspector General.

Additionally, in August 2012, the contract specialist stated that ACC-RI contracting personnel would follow up with DCMA monthly to ensure that the contractor addressed internal CARs. In January 2013, the contract specialist stated that ACC-RI personnel were still working with DCMA personnel to receive copies of all CARs issued for the ANP training contract. The contracting officer at ACC-RI should coordinate with the lead QAR to develop and implement a strategy to consistently review the contractor's internal CARs and take action on internal CARs that remain unresolved for more than 30 days to address previously identified contract issues.

Communication Required Between Oversight Personnel, Requirement Owners, and Contracting Office

DCMA officials did not coordinate with NTM-A/CSTC-A TPSO program management personnel, requirements owners, or ACC-RI personnel when creating the audit checklists; when updating the audit checklists as contract requirements changed; or when the CORs or QARs completed the audit checklists. TPSO, as part of NTM-A/CSTC-A, provided program management and coordinated contract requirements with the requirement owners. Accordingly, DCMA personnel should have coordinated and communicated with TPSO and the NTM-A/CSTC-A requirement owners when developing and updating the audit checklists so that all requirements critical to the success of the ANP contract were included in the audit checklists. Additionally, DCMA personnel did not provide TPSO personnel with completed COR audit checklists. Therefore, the requirement owners were not provided information to measure the success of the contractor in training and equipping the ANP forces.

The requirement owners were not provided information to measure the success of the contractor in training and equipping the ANP forces.

Additionally, DCMA personnel did not coordinate oversight procedures with ACC-RI personnel during the contracting process. The ACC-RI contracting officer stated that based on the audit checklist instructions, the CORs were identifying and focusing on minor nonconformance rather than reviewing whether the contractor was meeting the contract requirements as a whole. The contracting officer stated for a contract like the ANP training contract, using a quality assurance surveillance plan in conjunction with the SOW would be a more appropriate oversight methodology. The lead QAR stated the contracting officer at ACC-RI was responsible for developing the quality assurance surveillance plan. Furthermore, the lead QAR stated he never received a quality assurance surveillance plan, and therefore, the COR audit checklists were prepared solely on the ANP contract SOW.

Federal Acquisition Regulation Subpart 46.4, "Government Contract Quality Assurance," states quality assurance surveillance plans should be prepared in coordination with the SOW and should identify all work requiring surveillance and the type of surveillance. The DoD COR Handbook states the requiring unit that drafted the SOW typically develops the quality assurance surveillance plan that details how and when the Government will survey, observe, test, sample, evaluate, and document contractor performance. Furthermore, the Defense Federal Acquisition Regulation Supplement

Subpart 246.4, “Government Contract Quality Assurance,” states the contracting officer should prepare a quality assurance surveillance plan to facilitate assessment of contractor performance. However, the contractor created a quality assurance surveillance plan when the contract was awarded, and ACC-RI contracting personnel never updated the quality assurance surveillance plan despite four SOW modifications. In addition, ACC-RI contracting personnel, DCMA personnel, and the CORs did not use the contractor’s quality assurance surveillance plan as a method of contractor oversight.

Furthermore, DCMA did not provide the contracting officer with the completed COR audit checklists. Instead, DCMA provided the ACC-RI contracting officer with a monthly roll-up report, which described the number of CARs outstanding and the number of COR audit checklists received. However, the roll-up report did not summarize which nonconformances were level II or level III CARs, did not identify sites where the contractor had outstanding internal CARs, and did not identify sites where no oversight was being performed. Therefore, the DCMA roll-up report did not provide the ACC-RI contracting officer with a complete assessment of contract performance. Although the contracting officer delegated contract oversight to DCMA, the contracting officer was ultimately responsible for the contract and should be informed of all contract nonconformances to determine whether to take any contractual action.

The DCMA roll-up report did not provide the ACC-RI contracting officer with a complete assessment of contract performance.

The contracting officer, ACC-RI, should coordinate with the TPSO Program Manager, and the Commander, DCMA-Afghanistan, to determine whether the current oversight strategy is appropriate to oversee the contractor performance on the ANP contract and modify the oversight strategy as required. Once ACC-RI, TPSO, and DCMA-Afghanistan personnel agree on an appropriate oversight strategy, the contracting officer, ACC-RI, should coordinate with the TPSO Program Manager and the lead QAR to develop audit checklists or a quality assurance surveillance plan, or both, that includes all contract requirements that are critical to the success of the ANP contract. In addition, the contracting officer should coordinate with TPSO and DCMA-Afghanistan to update the audit checklists or quality assurance surveillance plan as necessary when the ANP contract SOW is modified.

Critical Quality Assurance Requirements Must Be Implemented

DCMA personnel did not implement the quality assurance requirements for oversight in Afghanistan that DCMA considered critical to mission success. Specifically, DCMA officials did not implement the requirements discussed in the Theater Quality Plan when implementing the oversight strategy for the ANP contract.

The purpose of the Theater Quality Plan is to provide oversight, guidance, and direction to DCMA personnel. The DCMA Theater Quality Plan states that documentation of contractor conformance and nonconformance is key to sustaining desired contractor performance.

However, the lead QAR and QAR assigned to the ANP contract did not create and update adequate audit checklists in a timely manner, maintain consistent oversight at ANP training sites, or require CORs to submit thorough and accurate audit checklists. The Commander should require the current and future lead QAR and QARs for the ANP training contract to comply with all Theater Quality Plan requirements to maintain oversight of the ANP contract. Additionally, the Commander, DCMA-Afghanistan, should determine whether the lead QAR and the QAR assigned to the ANP contract from January 2012 through June 2012 performed their assigned duties in accordance with DCMA criteria and provided sufficient oversight of the ANP training contract, and hold them accountable for deficient performance as appropriate.

Conclusion

DCMA, NTM-A/CSTC-A, and ACC-RI personnel should create and execute an effective oversight process. The objective of contract surveillance is to monitor contractor performance to ensure that the services received are consistent with contract requirements and received in a timely manner. To be effective, contract surveillance requires appropriate and immediate onsite monitoring of the services being performed. The effectiveness of contract surveillance depends on keeping the contracting officer informed of deviations from the contractual requirements. If DCMA, NTM-A/CSTC-A, and ACC-RI personnel cannot execute an effective quality assurance process, the Army cannot determine whether the contractor fully delivered the services, worth \$439 million, included in the ANP contract. Additionally, the Army will not be able to determine the effectiveness of contractor-provided training for the ANP, which could affect the ability of Afghan National Security Forces in leading security operations beginning in 2014, when the U.S. combat mission in Afghanistan is to end.

Recommendations, Management Comments, and Our Response

A.1 We recommend that the Commander, Defense Contract Management Agency-Afghanistan:

a. Review the lead quality assurance representative's and the quality assurance representative's performance related to oversight responsibilities for the Afghan National Police training contract to determine whether they properly managed contracting officer's representatives, created and updated audit checklists to reflect the requirements of the contract, and maintained oversight of the Afghan National Police training contract in accordance with the Theater Quality Plan requirements during the reporting period from January 2012 through June 2012 and, as appropriate, hold them accountable for deficient performance.

Defense Contract Management Agency-International Comments

The Acting Commander, DCMA-International, responding for the Commander, DCMA-Afghanistan, agreed with our recommendation, stating that DCMA determined that the appropriate actions to be taken were in process improvements, not personnel actions. He also stated that DCMA-Afghanistan processes were not as efficient as desired during the period in which the audit was performed, thereby making it difficult for quality assurance personnel to fully comply with their oversight responsibilities. In addition, the Acting Commander said that DCMA-Afghanistan has made process improvements, which included restructuring oversight efforts, increasing oversight checks on performed audits, and continuing assessment through internal controls reviews.

Our Response

Comments from the Acting Commander, DCMA-International were responsive, and no additional comments are required.

b. Direct the lead quality assurance representative and the quality assurance representative for the Afghan National Police contract to:

(1) Provide the contracting officer's representatives with the appropriate oversight documentation as it applies to the sites where the contracting officer's representatives are assigned, as required by the Defense Contract Management Agency Theater Quality Plan and the Contracting Officer's Representative Management Guide.

Defense Contract Management Agency-International Comments

The Acting Commander, DCMA-International agreed with our recommendation, stating that DCMA-Afghanistan will perform oversight in accordance with DCMA quality instructions and the DCMA COR Management Guide. He explained that the QAR and Government technical product representatives are responsible for verifying that CORs use the current checklists and that CORs possess a copy of the most recent SOW. The Acting Commander added that QARs perform checklist verifications by reviewing COR-submitted checklists before forwarding the audits up the DCMA-Afghanistan chain of command. He also stated that product QARs ensure that QARs, Government technical product representatives, and CORs receive the contractor's personnel status reports to aid in determining the current services performed by the contractor. The personnel status reports identify the contractor personnel filling each required position as compared to the most recent SOW and notices to proceed.

Our Response

Comments from the Acting Commander, DCMA-International were responsive, and no additional comments are required.

(2) Implement an oversight strategy for the contractor's program management office and the contract logistics warehouse.

Defense Contract Management Agency-International Comments

The Acting Commander, DCMA-International agreed with our recommendation, stating that DCMA-Afghanistan incorporated the contractor's program management office and the logistics warehouse into the surveillance plan and has been regularly auditing the activities at those locations since October 2012.

Our Response

Comments from the Acting Commander, DCMA-International were responsive, and no additional comments are required.

(3) In coordination with the Administrative Contracting Officer, identify and fill contracting officer's representative vacancies in a timely manner.

Defense Contract Management Agency-International Comments

The Acting Commander, DCMA-International agreed with our recommendation, stating that DCMA will identify COR vacancies to TPSO and IJC. He stated that DCMA-Afghanistan currently has adequate COR coverage for the Afghan MoI and for institutional training and mentoring requirements. The Acting Commander stated that COR coverage is currently inadequate for the fielded mentors. He added that DCMA has identified these shortfalls to TPSO and IJC and will appoint the required CORs when they are properly nominated and identified to DCMA-Afghanistan.

Our Response

Comments from the Acting Commander, DCMA-International were responsive, and no additional comments are required.

c. Direct the lead quality assurance representative to require the contractor to address all outstanding corrective action requests and internal corrective action requests related to contract health and safety requirements immediately and to address any new corrective action requests or internal corrective action requests related to contract health and safety requirements within 30 days of identification.

Defense Contract Management Agency-International Comments

The Acting Commander, DCMA-International agreed with our recommendation, stating that as of April 30, 2013, the contractor had five open internal CARs and two of those were related to health and safety requirements. He stated that DCMA-Afghanistan regularly tracks internal CARs and monitors how the contractor addresses nonconformances. The Acting Commander stated DCMA receives biweekly updates on the internal CAR statuses and action plans to ensure issues are addressed in a timely manner and any necessary procedures are put in place to prevent reoccurrence. He added that DCMA-Afghanistan closely monitors items related to life, health, and safety. The Acting Commander also stated that the contractor's quality control plan requires internally identified deficiencies to be corrected within 30 days of occurrence, and if the contractor fails to do so, DCMA retains the right to issue a CAR on the contract.

Our Response

Comments from the Acting Commander, DCMA-International were responsive, and no additional comments are required.

A.2 We recommend that the Contracting Officer, Army Contracting Command-Rock Island:

a. Coordinate with the Combined Security Transition Command-Afghanistan Training Program Support Office, Program Manager, Afghan National Police training contract, and the Commander, Defense Contract Management Agency-Afghanistan, to review the Afghan National Police training contract oversight strategy, and:

(1) Determine whether the current oversight strategy is appropriate to oversee contractor performance on the Afghan National Police contract and modify the oversight strategy as required.

(2) Develop audit checklists or a quality assurance surveillance plan, or both, that includes which statement of work and contract requirements are critical to the success of the Afghan National Police contract. The Contracting Officer, Army Contracting Command-Rock Island, should subsequently coordinate with Training Program Support Office and Defense Contract Management Agency-Afghanistan personnel to update the audit checklists or quality assurance surveillance plan as necessary when the Afghan National Police contract statement of work is modified.

Army Contracting Command Comments

The Commander, Army Contracting Command, responding for the Contracting Officer, ACC-RI, agreed with our recommendation, stating that since the contract formally transferred from Army Contracting Command-Aberdeen Proving Ground, ACC-RI has been continuously working with TPSO and DCMA-Afghanistan to review and refine the oversight strategy. She stated that ACC-RI determined that use of the audit checklists instead of a quality assurance surveillance plan was adequate; however, she added that it is vital that the checklists be regularly updated as the SOW is modified. The Commander also stated that DCMA indicated that they must adhere to the Theater Quality Plan for surveillance, and as a result, the lead QAR is responsible for updating the audit checklists. In addition, she explained that ACC-RI has always provided DCMA-Afghanistan with an updated SOW after every SOW change; she stated that further discussions on the oversight strategy in March 2013 resulted in DCMA-Afghanistan agreeing to update the audit checklists after every SOW change. The Commander explained that ACC-RI added the lead QAR directly to the distribution of any SOW changes to ensure that the audit checklists are updated expeditiously.

Our Response

Comments from the Commander, Army Contracting Command were responsive, and no additional comments are required.

b. Coordinate with the lead quality assurance representative to develop and implement a strategy to consistently review contractor internal corrective action requests and take action on internal corrective action requests that are unresolved for more than 30 days.

Army Contracting Command Comments

The Commander, Army Contracting Command agreed with our recommendation, stating that ACC-RI has been coordinating with DCMA-Afghanistan on this issue for nearly a year, and the situation has improved. She stated that DCMA-Afghanistan agreed to issue CARs for the individual internal CARs that go unresolved or have slippage past 30 days. In addition, the Commander stated that ACC-RI has been coordinating with DCMA-Afghanistan to ensure copies of all CARs are provided to the contracting office, and as of March 27, 2013, there were seven open internal CARs, none of which had gone past the corrective action plan due date. She added that ACC-RI will continue to follow up with DCMA-Afghanistan monthly to ensure that any CARs or internal CARs are being properly addressed and the contractor is held accountable. The Commander explained that, to complete the monthly review, ACC-RI will add it to the agenda for biweekly Government teleconferences held between ACC-RI, TPSO, and DCMA-Afghanistan, and will request that DCMA-Afghanistan submit an updated CAR and internal CAR tracking document prior to the meeting.

Our Response

Comments from the Commander, Army Contracting Command were responsive, and no additional comments are required.

Finding B. Incomplete Audit Checklists Hinder Contractor Oversight

The CORs for the ANP contract did not conduct effective contractor surveillance. Specifically, the CORs did not always complete the required number of audit checklists based on assigned risk levels. When the CORs documented surveillance on the audit checklists, they did not always provide adequate or consistent information on the audit checklists to communicate their oversight results, complete the entire audit checklist, or properly document contractor noncompliance for 147 of 166 audit checklists we reviewed. This occurred because the QAR did not consistently review the COR audit checklists for compliance with the Theater Quality Plan, provide the CORs with feedback on the completed audit checklists, or properly train the CORs on their oversight responsibilities. As a result, DCMA officials could not verify that the Army fully received approximately \$20.9 million per month of services paid under the ANP contract.

Audit Checklists Were Not Completed in Accordance With Guidance

The CORs did not provide adequate contractor surveillance for the ANP contract. Specifically, the CORs did not always complete their DCMA audit checklists in accordance with the guidance in the DCMA Theater Quality Plan or the DCMA COR Management Guide, as required for 147 of 166 of the audit checklists we reviewed.

Required Number of Audit Checklists Not Completed

The CORs did not always complete the required number of audit checklists based on assigned risk levels. The initial risk analysis for the ANP contract assessed basic life support services, food service operations, and training and mentoring services as a moderate risk, and force protection services as a high risk. According to the DCMA Theater Quality Plan, the COR should conduct a moderate-risk service examination once a month and a high-risk service examination twice a month. If the COR was not available to conduct an audit, the QAR was responsible.

The DCMA Theater Quality Plan states if travel to a site was restricted, the QAR must perform a desk audit⁷ or an alibi audit⁸ if an onsite audit could not be performed. However, the Theater Quality Plan includes conflicting guidance because an alibi audit meant that the COR or QAR did not conduct an audit even though the Theater Quality Plan required at least one audit per month for moderate-risk services and two audits per month for high-risk services.

⁷ The DCMA Theater Quality Plan explains that desk audits are “document only” audits and are authorized for services; however, an onsite examination should always be attempted.

⁸ The DCMA Theater Quality Plan states if the QAR or COR is unable to perform an audit, the QAR must submit an alibi audit. The Plan also states an alibi audit is an explanation of why an actual audit was not conducted and that alibi audits are annotated on the audit checklist coversheet with an explanation in the audit summary.

On May 14, 2012, the lead QAR stated DCMA would no longer conduct alibi audits. Additionally, the DCMA International Contingency Operations Planner stated on January 28, 2013 that DCMA had updated the audit process and no longer used alibi audits. However, during that period, DCMA did not provide an updated Theater Quality Plan and therefore, the QARs were still allowed to submit alibi audits. According to DCMA records, the CORs assigned to the 12 ANP training sites where we reviewed audit checklists completed 166 of the 287 required audit checklists from January 2012 through June 2012. (See Appendix B for the site audit checklists we reviewed and how many audit checklists the CORs or the QAR completed at each site.)

For example, from January to June 2012 the CORs assigned to RTC Konduz completed 15 of the 36 required audit checklists. DCMA did not have a COR appointed for February 2012 and the majority of March 2012. As a result, DCMA did not conduct oversight as required by the Theater Quality Plan. The QAR turned in 11 alibi audit checklists during those months, indicating there was no COR at the site, and stated since the “GTPRs [Government technical product representatives]⁹ located in Kabul are not approved for travel outside of the RC-C [Regional Command-Capital]...therefore, the audit was not performed.” However, one of the 11 alibi audits completed during those months indicated that “a new COR did not arrive on site until mid-Mar but performed the first FPS [force protection services] audit...the COR did not submit a second FPS audit for Mar. No valid excuse was given.” In other instances, the CORs assigned to RTC Konduz did not provide the QAR with the required number of audit checklists because the CORs did not complete the two required force protection service audit checklists each month. Additionally, according to DCMA’s records, the CORs did not always complete the required food support operation, basic life support, or trainer/mentor service audit checklist each month.

In another example, from January through June 2012, the CORs assigned to CTC Kabul completed 12 of 30 required audit checklists. DCMA did not have a COR assigned to the site in March and April 2012, and no oversight was conducted. The QAR submitted eight alibi audits for March and April 2012, indicating there was no COR and that the “GTPRs [Government technical product representatives] located in Kabul were scheduled to visit the site in order to perform the required audits...but due to security issues within the area the GTPRs were unable to travel to this site.” The QARs did not perform an alibi audit for the command mentor checklists during those months. The lead QAR explained the command mentor checklist was not completed because of an error on DCMA’s part. Additionally, according to DCMA’s records, the CORs did not always complete the two required force protection service audit checklists or the basic life support, and trainer/mentor service audit checklists each month as required.

The DCMA Theater Quality Plan states implementation of a successful surveillance strategy depends on the level of risk identified and the measures applied to mitigate

⁹ Based on information in the Theater Quality Plan and statements made by DCMA officials, a QAR and a Government technical product representative perform the same job functions. Therefore, we use the term QAR throughout the report for both.

potential impact. The QAR and CORs were required to complete the audit checklists based on the assigned risk levels; however, they did not follow DCMA's surveillance strategy when they did not perform the required audit checklists each month. The Commander, DCMA-Afghanistan, should: update the Theater Quality Plan and remove the option of conducting an alibi audit; require the QAR to validate that each COR is aware of the risk rating for the services provided at their site locations and are familiar with the corresponding audit checklist requirements, including the number of audits required each month; and validate that the QAR completes the required audit checklist when a COR is not available, as required by the DCMA Theater Quality Plan.

COR Comments Should Support What Was Reviewed

The CORs for the ANP contract did not always provide adequate or consistent information on the audit checklists to communicate their oversight results. The DCMA Theater Quality Plan states that the CORs are to document the audit checklist questions by marking "yes" or "no," and provide comments detailing what was evaluated, where, and in what manner. If the COR marks "no," the DCMA Theater Quality Plan states that the comments are to describe the nonconformance. The Plan states that if the COR determines it necessary to mark an item as "not-observed" or "not applicable," the item requires a comment explaining the reason why the COR made that determination. The Theater Quality Plan also states that there will be instances where some audit checklist questions do not warrant this level of detail, but the COR should not consider this the rule. However, the CORs did not always comply with the guidance in the DCMA Theater Quality Plan.

In a February 2012 trainer/mentor audit checklist, the MoI COR responded "yes" to 20 percent of the audit checklist questions, indicating that the contractor complied with the requirements. However, for all of the comments where the COR responded "yes," the comment either did not support the "yes" response or provide details of how the COR determined the contractor complied with the requirement. For example, the COR responded "yes" to the question "does the contractor provide one mentor...to develop the ANP/MoI Legal Affairs to provide timely, effective legal advice and services throughout MoI and the ANP." The COR stated in his comments that the contractor-provided mentor did not assist in all the duties as defined in the SOW for the month of February, but it was expected that the mentor would meet the provision in the upcoming month. Based on the CORs comments and DCMA guidance, the COR should have answered "no." The COR also responded "yes" to "does the contractor provide a mentor...to work all aspects of developing policy and strategy for salary and payroll." However, the COR stated in his comments that the mentor was newly assigned and working toward understanding the pay system and building relationships.

In a May 2012 basic life support audit checklist, the COR at RTC Kandahar responded "yes" to a question that asked, "does the contractor police all areas to ensure insects...are removed and to prevent infesting of any site and facility." The comment the COR provided stated that "the COR inspected all traps and found that 60 percent were ineffective, and 20 percent of the adhesive traps were dried out and a dead rodent was

found in one.” Accordingly, the contractor did not meet the requirement as stated in the SOW, and the COR should have answered “no.”

In a June 2012 food services audit checklist, a COR responded “yes” to the question “verify that the contractor maintains a 21 day supply of non-perishable foods.” The COR marked that the contractor complied with the requirement and stated that the contractor “has a 21 day supply available and being replace [sic] by date to ensure freshness on every delivery.” However, the comment did not detail how the COR verified that the contractor complied with the requirement.

CORs Must Complete Audit Checklists to Provide Useful Oversight Information

The MoI COR for the ANP contract did not always complete the entire audit checklist for assigned sites each month. For example, for the February trainer/mentor audit checklist, the MoI COR marked more than 70 percent of the audit checklist questions as “not observed.” The COR explained that because of travel restrictions set by DCMA, he relied on points of contact who were the requirements owners of the provided services located at the sites to provide him feedback on the contractor’s performance. Furthermore, the COR indicated because of a reorganization, and because he was newly assigned, he could not identify his points of contact for the SOW requirements or the points of contact had not responded to his requests for information. Additionally, the COR stated he was relying on the QAR to assist him in obtaining the points of contact he needed to complete his audit checklists; however, the QAR had not assisted the COR in locating the points of contact.

...the COR indicated because of a reorganization, and because he was newly assigned, he could not identify his points of contact for the SOW requirements or the points of contact had not responded to his requests...

The COR was able to identify and contact more of the points of contact at the MoI from April to June, which allowed him to complete more of the audit checklists requirements. However, the MoI COR still marked “not observed” for about 28 percent of the audit checklist questions in April, 26 percent in May, and 26 percent in June because of the challenges he faced with locating and getting a response from the points of contact for the requirements.

The DCMA Theater Quality Plan states the audit checklists are written to cover all pertinent requirements as identified in the SOW in order to hold the contractor responsible for meeting contractual obligations. When the COR for the ANP contract does not observe a substantial amount of the requirements performed by the contractor, DCMA has limited assurance that the contractor successfully performed the requirements pertinent to the ANP contract.

CORs Must Document Noncompliance With Contract Requirements

The CORs for the ANP contract did not always properly document noncompliance in the audit checklists we reviewed. The DCMA Theater Quality Plan states that CORs are required to enter a description of all nonconformances identified during the audit in the “Non-conformance Against Contract Requirements” section of the audit checklist. If the contractor already issued an internal CAR for the identified nonconformance, the DCMA Theater Quality Plan stated the COR should appropriately document the internal CAR number in the audit checklist.

For June 2012, the COR for the MoI inappropriately reported the contractor complied with a requirement in the trainer/mentor audit checklist, although his comments on the audit checklist indicated the contractor was not in compliance. The COR’s comments noted the contractor provided one mentor; however, the individual went on leave and indicated his intent to take a civil service

For June 2012, the COR for the MoI inappropriately reported the contractor complied with a requirement in the trainer/mentor audit checklist, although his comments on the audit checklist indicated the contractor was not in compliance.

position and not return to the team as an advisor. Additionally, the COR’s comment noted at the time, the contractor had not officially apprised the Government of the individual’s status or whether they intended to fill the position with another qualified person. The COR did not document a nonconformance on the audit checklist, as required, to alert the QAR to review the nonconformance and issue a CAR, if necessary.

In an April 2012 basic life support audit checklist, a COR documented the contractor “failed to test Waste Water Treatment Plant” because no testing kit was onsite. The COR additionally stated he identified failed equipment and the contractor was still waiting for parts to arrive to fix the equipment. The COR appropriately responded “no” on the audit checklist; however, the COR did not properly document a nonconformance on the audit checklist in the “Non-conformance Against Contract Requirements” section, as required by the DCMA Theater Quality Plan, to alert the QAR to review the nonconformance and issue a CAR, if necessary.

If the COR does not properly document the noncompliance identified in the audit checklist, DCMA will not know to take corrective action against the contractor.

Inadequate Review and Lack of Feedback on COR Audit Checklists

The QARs did not always review the COR audit checklists for compliance with the DCMA Theater Quality Plan or provide the CORs with feedback on the completed audit checklists. The Theater Quality Plan states because of the many outside requests for copies of DCMA audit checklists, the level of detail and information provided in the audit checklists is critical. The Theater Quality Plan requires the QARs to review all COR audit checklists for completeness and forward the audit checklist to the appropriate

DCMA central repository within 3 days of the audit checklist review. If the QAR identifies errors in the audit checklist, the DCMA COR Management Guide states the QAR should return the audit checklist to the COR for corrections. However, 5 of the 10 CORs we interviewed explained they did not receive feedback from the QAR after submitting their audit checklists.

The DCMA COR Management Guide states the CORs are a critical part of the DCMA oversight strategy. The QARs were responsible for mentoring the CORs and evaluating and approving COR audit checklists to ensure DCMA quality standards were met. Therefore, if the QARs did not properly review the COR audit checklists or request CORs make corrections to audit checklists based on omissions or errors, QARs did not comply with the DCMA oversight strategy and limited their ability to rely on the CORs to provide adequate oversight of the ANP contract. The Commander, DCMA-Afghanistan, should establish a control process to verify that the QARs properly review all COR audit checklists for completeness and return the audit checklists to the CORs, with feedback, as required by the DCMA COR Management Guide, if the QARs finds that the CORs did not do the following: provide comments that support the response given, complete each section of the audit checklists required for the site, or properly document when the contractor did not comply with the contract requirements.

Training CORs to Monitor Contractor Performance

DCMA personnel did not properly train the CORs on their oversight responsibilities. The DCMA COR Management Guide states that the COR training process consists of two phases. Phase I of the training process includes the formal oversight training required. While the CORs adequately completed the Phase I training, DCMA personnel did not implement a Phase II training process that adequately prepared the CORs for their primary role of monitoring contractor performance for the ANP contract.

The DCMA COR Management Guide states Phase II of the COR training includes a DCMA orientation, an introduction to DCMA oversight policies and procedures as outlined in the DCMA Theater Quality Plan, and specific training with regard to the contract to which the nominee may be assigned. The DCMA COR Management Guide stated the contract-specific training should include a review of the important requirements in the SOW; the roles and responsibilities of all the individuals involved with contract oversight, including the ACO, the QAR, and the COR; and a review of previous contractor performance on the effort, if any. However, the COR Phase II training provided by DCMA was not specific to the ANP contract. The DCMA training was not updated to reference the current version of the SOW that the CORs should have used in conjunction with the audit checklist. Additionally, four of the nine CORs we

The DCMA training was not updated to reference the current version of the SOW that the CORs should have used in conjunction with the audit checklist.

interviewed¹⁰ did not have the opportunity to review the previous COR audit checklists before starting their oversight duties at their assigned sites. For example, one COR was only able to locate two audit checklists from the last year completed by the previous COR assigned to his site. The COR stated he requested all the completed audit checklists from the QAR for his site; however, he never received them.

The DCMA COR Management Guide also requires that the COR nominee conduct a joint validation audit with the QAR using a DCMA audit checklist to ensure the nominee fully understands the audit requirements and can satisfactorily perform oversight for the contract before being appointed. The DCMA COR Management Guide states that when the QAR cannot travel to the site for the joint audit, the nominee is to perform a solo audit and submit the audit checklist to the QAR for review and feedback. However, the QAR did not always require the COR nominees to perform a validation audit before being appointed, review the validation audits submitted by the COR nominees, and provide feedback to the CORs. For example, DCMA appointed one COR almost a month before she completed the validation audit. When asked why DCMA appointed the COR before she completed the validation audit, the QAR stated this occurred because the COR had previous experience and he could not travel to the site to perform the audit with the COR. The QAR stated that rather than not having a COR appointed for the month, he decided to forgo the validation audit.

In February 2012, the COR for the MoI performed a validation audit using a trainer/mentor family response unit audit checklist. For the question “do the contract mentors maintain a liaison...to ensure that appropriate personnel assignments are made to the FRUs [family response units],” the COR documented that the point of contact stated “they complete the job, but had no additional comments in this area.” The COR marked “yes,” indicating the contractor was in compliance; however, the comment provided did not comply with the requirements in the DCMA Theater Quality Plan and describe how the contractor complied with this requirement. The COR put the same comment in 10 out of 24 questions on the checklist and marked “yes” for each question. The QAR did not review the COR’s audit checklists and provide him feedback or have the COR make any changes to his validation audit checklist before the ACO formally appointed him as COR.

The DCMA Theater Quality Plan states the COR should add technical expertise and serve as another set of eyes to improve and increase contractor oversight. Additionally, the Theater Quality Plan states that the CORs enable DCMA to better serve the warfighter at a theater-wide level as they increase DCMA’s coverage and ability to oversee the contractor. Therefore, DCMA must properly train the CORs, as required by the DCMA COR Management Guide, so they are prepared to help DCMA serve the warfighter and improve and increase contractor oversight. The Commander, DCMA-Afghanistan, should establish a quality control process to verify that the DCMA QARs provide contract-specific Phase II training to all CORs assigned to the ANP contract in accordance with the DCMA Theater Quality Plan and COR Management Guide, before

¹⁰ We interviewed 10 CORs; however, at one site, no COR was assigned previously, and therefore, no previous COR audit checklists existed.

sending the CORs to their assigned sites. Additionally, the Commander, DCMA-Afghanistan should verify that the QARs provide the CORs with the files of the previous CORs to review and fully understand the specific services the contractor performs at the assigned site.

Conclusion

The CORs did not perform adequate oversight at their assigned sites or adequately complete 147 of the 166 DCMA audit checklists we reviewed. If DCMA personnel properly trained the CORs on their oversight responsibilities, or consistently reviewed the COR audit checklists and provided the CORs feedback on the completed audit checklists, the CORs would have been better prepared to perform their oversight responsibilities. Without adequate COR oversight, DCMA had limited assurance the Army received the full value for approximately \$20.9 million per month in services paid for under the ANP contract.

Recommendations, Management Comments, and Our Response

B.1. We recommend that the Commander, Defense Contract Management Agency-Afghanistan, update the Defense Contract Management Agency Theater Quality Plan and remove the option for conducting an alibi audit.

Defense Contract Management Agency-International Comments

The Acting Commander, DCMA-International, responding for the Commander, DCMA-Afghanistan, agreed with our recommendation, stating that although Afghanistan is a dangerous warzone environment with communication and transportation difficulties, every effort is made to complete audits as scheduled. However, he stated there may be instances when onsite desk audits cannot be performed. These instances will be recorded as an audit not performed and include documentation as to why the audit could not be performed and the efforts made to accomplish it.

Our Response

Comments from the Acting Commander, DCMA-International, were partially responsive. The Theater Quality Plan states, "an alibi audit is an explanation of why an actual audit was not conducted. Alibi audits are submitted on the audit coversheet with an explanation documented in the audit summary block." However, during our review of audit checklists, if an audit was not completed, supporting documentation or an explanation of what efforts were taken to perform the audit was not provided. We request the Commander, DCMA-Afghanistan provide an explanation whether the Theater Quality Plan will be updated to clearly state that when an audit is not performed supporting documentation will be provided, specify the efforts made to accomplish the audit, and to include this information in the audit checklist.

B.2. We recommend that the Commander, Defense Contract Management Agency-Afghanistan, establish a quality control process to verify that the Defense Contract Management Agency quality assurance representatives:

a. Validate that each contracting officer's representative is aware of the risk rating for the services provided at the site locations and knows the corresponding audit checklist requirements, including the number of audits required to be completed each month.

Defense Contract Management Agency-International Comments

The Acting Commander, DCMA-International agreed with our recommendation, stating that existing processes were in place to satisfy the recommendation; however, they were not adhered to. He explained that as of April 30, 2013, QARs were sending the CORs updated audit checklists and the SOW, and providing guidance to the CORs regarding risk ratings and the number of audits to be performed. The Acting Commander added that there is a new DCMA-Afghanistan service tracker database that provides an exportable surveillance plan that is distributed to the quality assurance personnel and the CORs monthly or whenever there is a change to the surveillance plan. He stated that the surveillance plans identify the audits required for each site and service, and the current risk rating. In addition, the Acting Commander said that DCMA-Afghanistan provides guidance on the audit checklists during the COR training and through regular COR feedback. He stated that QARs will grade one audit checklist from each COR monthly and provide written feedback to the CORs and their supervisors. Additionally, the Acting Commander stated that the QAR or the Government technical product representatives will conduct quarterly validation audits with each assigned COR, which will include a mix of in-person and over the phone reviews.

Our Response

Comments from the Acting Commander, DCMA-International were responsive, and no additional comments are required.

b. Complete the required audit checklist when the contracting officer's representative is not available, in accordance with the Defense Contract Management Agency Theater Quality Plan.

Defense Contract Management Agency-International Comments

The Acting Commander, DCMA-International agreed with our recommendation, stating that the QAR and Government technical product representative personnel make every effort to conduct audits when a COR is not available; however, based on operational circumstances this is not always practical. He added that in the event that a QAR or Government technical product representative cannot perform a required audit or a desk audit, they will complete and submit an audit not performed document.

Our Response

Comments from the Acting Commander, DCMA-International were responsive, and no additional comments are required. Once the Commander, DCMA-Afghanistan responds to Recommendation B.1, an audit not performed will include information regarding why

an audit could not be completed. Therefore, the Acting Commander's response is adequate for this recommendation.

c. Review all contracting officer's representatives audit checklists for completeness and return the audit checklists to the contracting officer's representatives, with feedback, as required by the Defense Contract Management Agency Contracting Officer's Representative Management Guide, if the quality assurance representatives finds that the contracting officer's representative did not do the following:

(1) Provide comments that support the response given to the question.

(2) Complete each section of the audit checklist required for the site.

(3) Properly document when the contractor did not comply with the contract requirements.

Defense Contract Management Agency-International Comments

The Acting Commander, DCMA-International, agreed with our recommendation, stating that DCMA is enhancing the process for quality assurance oversight of the TPSO contracts to improve assessment of the COR completed audit checklists. He explained that these enhancements included increasing reviews, a centralization of oversight activities at Camp Eggers, Afghanistan, and random sampling by tertiary command QARs.

Our Response

Comments from the Acting Commander, DCMA-International were responsive, and no additional comments are required.

d. Provide contract-specific Phase II training to all contracting officer's representatives assigned to the Afghan National Police contract in accordance with the Defense Contract Management Agency Theater Quality Plan and Contracting Officer's Representatives Management Guide before sending the contracting officer's representatives to their assigned sites.

Defense Contract Management Agency-International Comments

The Acting Commander, DCMA-International agreed with our recommendation, stating that contract-specific Phase II training is a DCMA-Afghanistan requirement instituted from experience gained in administering service contracts. He stated that DCMA-Afghanistan makes every effort to provide contract-specific Phase II training to all CORs whenever possible. He explained that there were two primary contributing factors to many of the CORs on the contract not receiving adequate Phase II training during the period covered by the audit report. The Acting Commander said that the first contributing factor was that DCMA-Afghanistan personnel often lacked access to the performance sites due to operational risks and a lack of available transportation. He stated that the second contributing factor was that DCMA-Afghanistan personnel had limited access to the CORs responsible for performing the direct onsite oversight efforts

due to the operational risks associated with transportation. The Acting Commander also stated that the two contributing factors limited DCMA's ability to accomplish effective face-to-face Phase II training, and DCMA was limited in those cases to perform training via e-mail exchanges and telephone conversations.

Our Response

Comments from the Acting Commander, DCMA-International, were partially responsive. We recognize the challenges with providing CORs traveling to remote sites face-to-face Phase II training; however, the Acting Commander did not provide information in his response regarding how these challenges would be overcome to provide all CORs with the Phase II training. Although Phase II training is a requirement specific to DCMA-Afghanistan, and not required by DoD as a whole, it was required by DCMA's COR Management Guide and the Theater Quality Plan. Phase II training, as defined by the COR Management Guide, would better prepare the CORs by requiring the CORs to receive contract documentation and contract-specific guidance during the training. Some of the CORs on the ANP contract did not have quality assurance backgrounds, did not receive copies of the prior COR audit checklists, and did not receive contract-specific oversight guidance. Phase II training would assist CORs in understanding their oversight duties and result in greater quality assurance oversight for the ANP contract. We request the Commander, DCMA-Afghanistan, provide additional comments in response to the final report that state how DCMA-Afghanistan will fully comply with Phase II training requirements and provide the training to all CORs prior to the CORs arriving at their assigned sites and beginning their COR duties.

e. Provide the contracting officer's representatives the files of the previous contracting officer's representatives to review and fully understand the specific services the contractor performs at the assigned site.

Defense Contract Management Agency-International Comments

The Acting Commander, DCMA-International agreed with our recommendation, stating that as directed in the COR appointment letter, it is the responsibility of the outgoing COR to provide a continuity book to the incoming COR in accordance with the Theater Quality Plan. He added that it is the responsibility of the previous COR, their supervisor, and the CORs' assigned unit to ensure that this exchange occurs. The Acting Commander explained that the files are frequently located in offices at sites that the DCMA-Afghanistan quality assurance personnel have limited or no capability to visit. He also stated that if the previous COR's files become lost or destroyed, DCMA-Afghanistan will provide the new CORs with all applicable contract documents, training material, audit checklists, and audit reports completed by the previous CORs.

Our Response

Comments from the Acting Commander, DCMA-International were responsive, and no additional comments are required.

Finding C. Improved Oversight of the Fielded Mentors Needed

DCMA and IJC¹¹ personnel did not perform adequate oversight of the fielded mentors¹² for the ANP contract. Specifically, DCMA and IJC personnel did not consistently nominate and appoint CORs for fielded mentor oversight and the CORs did not adequately complete DCMA audit checklists. This occurred because DCMA and IJC personnel did not have a strategy for oversight of the fielded mentors adequate to overcome the challenges in performing these services in remote and dangerous locations. Additionally, DCMA personnel did not always train fielded mentor CORs and review and follow up on audit checklists received from CORs. As a result, the Commanders for DCMA and IJC had limited assurance the Army received contracted fielded mentor services for the Afghan National Civil Order Police (ANCOP), Afghan Uniform Police, and Afghan Border Patrol in remote and isolated headquarters, regional, provincial, and district locations throughout Afghanistan.

COR Nomination and Appointment

DCMA and IJC officials did not consistently nominate and appoint CORs for fielded mentor oversight. DCMA and IJC established a strategy to embed 22 IJC fielded mentor CORs with the 22 fielded mentor supervisors in Afghanistan. DCMA relied on IJC officials to obtain fielded mentor COR nominations in accordance with the DCMA COR Management Guide. The DCMA COR Management Guide requires QARs to train and mentor the prospective COR to ensure the nominee fully understands the audit requirements and can satisfactorily perform oversight for the contract. The DCMA COR Management Guide further requires the ACO to appoint the COR once the nominee satisfies all COR requirements.

An IJC CJ4 Logistics Officer served as the lead official responsible for forwarding fielded mentor COR nominations to the appropriate QARs to begin the appointment process and ensure IJC COR coverage was adequate for the fielded mentors. The Logistics Officer was responsible for overseeing regional command officials within the IJC area of responsibility. (Appendix C provides an overview of the IJC fielded mentor regions.) The Logistics Officer required regional command officials to track COR billets and verify that the IJC fielded mentor COR coverage was adequate in their region.

¹¹ IJC was the requirements owner and was responsible for fielded mentor oversight independent of the CSTC-A command for the ANP contract. DCMA and IJC implemented a COR Strategy for IJC CORs performing oversight for fielded mentors throughout Afghanistan.

¹² Fielded mentors assigned to IJC were contractors who conducted training and mentoring operations in the field. The fielded mentors were under the operational control of military components and security forces who served as police mentoring teams. Fielded mentors lived, slept, and ate with their military counterparts in remote areas throughout Afghanistan.

IJC COR Nominations

IJC did not consistently nominate CORs for fielded mentor oversight. Specifically, the Regional Command (RC)-Southwest and RC-East officials did not have consistent strategies for nominating CORs on the ANP contract.

The RC-Southwest official outlined a process to identify all fielded mentor locations and nominate IJC personnel to provide oversight of all fielded mentors within his region. Specifically, the RC-Southwest official issued an RC-Southwest Fragmentary Order that required all units within the region who worked with fielded mentors to provide the RC-Southwest official with fielded mentor COR nominations by specific dates. The DCMA and IJC COR strategy allotted three RC-Southwest fielded mentor CORs for the RC-Southwest region. However, the RC-Southwest official stated fielded mentors operated at 13 sites, and he expected IJC personnel at those sites to respond back to the RC-Southwest Fragmentary Order by submitting one fielded mentor COR nomination for each site. In doing so, the RC-Southwest official established a process resulting in 13 CORs for the region when the oversight strategy only allocated 3 fielded mentor CORs.

Conversely, the RC-East official did not have an adequate strategy in place to identify new IJC fielded mentor COR nominations. The RC-East official did not verify whether fielded mentor COR coverage was adequate in his region and did not have an understanding of what locations the fielded mentor COR billets

The RC-East official did not verify whether fielded mentor COR coverage was adequate in his region and did not have an understanding of what locations the fielded mentor COR billets covered.

covered. The RC-East official stated he was responsible for eight fielded mentor CORs within the RC-East region according to the DCMA and IJC fielded mentor COR strategy; however, the RC-East official relied solely on the outgoing fielded mentor CORs to identify a replacement COR and did not know what ANP contract areas were covered in his region. As a result, IJC had gaps in fielded mentor oversight within the RC-East region and both RC-East and RC-Southwest regions did not have consistent strategies in place to provide adequate oversight.

DCMA COR Appointments

DCMA officials did not consistently appoint CORs for fielded mentor oversight. DCMA officials stated once IJC personnel provided COR nominations, the ACO reviewed the COR nomination letter and supporting documentation and verified the nominated CORs completed DCMA-specific training to meet the COR requirements. The ACO stated the QARs were responsible for providing the nominated CORs with DCMA-specific training, and the ACO would draft and sign an appointment letter once all COR requirements were complete.

The ACO generally appointed fielded mentor CORs in accordance with the DCMA and IJC strategy for fielded mentor services. However, the RC-Southwest official stated some IJC nominated fielded mentor CORs did not complete the DCMA-specific COR training, resulting in the ACO's not appointing those nominated personnel for the

contract. However, personnel nominated by RC-Southwest still performed oversight of the fielded mentors. We determined that 20 IJC personnel in RC-Southwest completed audit checklists from August 2011 through June 2012, only one of whom the ACO appointed as a COR for the contract. The ACO appointed the fielded mentor COR approximately two months after his nomination by IJC personnel. The COR only performed official fielded mentor oversight duties during the last 2 months of his deployment. Since the ACO only appointed one of the 20 IJC personnel who conducted oversight for the RC-Southwest region as a COR, DCMA officials had limited awareness of RC-Southwest oversight efforts. Appendix D illustrates the number of audit checklists completed by the personnel involved in RC-Southwest's oversight, and the timeframes and nomination and appointment status.

The DCMA COR Management Guide outlines the nomination, training, and appointment process for CORs; however, it provides no guidance on how the requiring activity should work with DCMA officials to nominate prospective CORs and does not outline how DCMA officials should work with the requiring activity to train and appoint CORs. Without properly trained and appointed CORs performing oversight, DCMA had limited assurance that IJC personnel understood the audit checklist requirements and could satisfactorily perform oversight of the contract.

Fielded Mentor CORs Completion of Audit Checklists

IJC fielded mentor CORs did not adequately complete DCMA audit checklists in accordance with the DCMA Theater Quality Plan. The DCMA Theater Quality Plan states audit checklists are written to cover all pertinent requirements as identified in the SOW to determine whether the contractor met its contractual obligations. Additionally, the DCMA Theater Quality Plan outlines the requirements for adequate responses to questions in audit checklists.

RC-Capital Audit Checklists

DCMA officials provided three of the six required audit checklists from January through June 2012 for the RC-Capital. However, the three audit checklists the RC-Capital fielded mentor COR completed did not comply with the DCMA Theater Quality Plan. For example, in the May 2012 checklist, one question in the audit checklist states,

Within the first six months, did the mentor train the Headquarters Personnel or Administration Officer or his designated representative to develop a Personnel Qualification system in conjunction with ANCOP Headquarters and Regional Headquarters, which will be the basis for tracking police officer qualifications, and proficiency?

The fielded mentor COR responded to the requirement with a "not applicable" and provided a comment stating, "Not sure what this is. But am assuming the ANCOP are doing it. This is not something we have done." The DCMA Theater Quality Plan requires that a "not applicable" response explain the reason why the requirement was not applicable. The fielded mentor COR did not provide a reason why the requirement was not applicable; however, he indicated that he did not know what the requirement was, and he did not determine whether the contractor was performing the required service.

RC-East Audit Checklists

DCMA officials provided four of the six required audit checklists from January through June 2012 for one of the fielded mentor CORs at RC-East. The RC-East fielded mentor COR, who was assigned to the Gardez region, completed three of the six checklists¹³; however, all three audit checklists were inadequate. The Gardez fielded mentor COR did not function in an oversight role for the checklist questions the QAR assigned him to complete. Instead, the Gardez fielded mentor COR collected information directly from the contractor to answer the questions. For example, in the April 2012 checklist, the COR stated that he would send the next month's audit checklist to a contractor supervisor and have the contractor gather details of the fielded mentors he supervised. On May 19, 2012, a contractor supervisor provided answers to audit checklist questions via e-mail to the Gardez region COR. As a result, the Gardez fielded mentor COR did not independently validate the contractor performed the technical requirements of the contract in accordance with the SOW for fielded mentor services.

The Gardez fielded mentor COR did not independently validate the contractor performed the technical requirements of the contract in accordance with the SOW for fielded mentor services.

One Task Force Spartan fielded mentor COR¹⁴ stated he was responsible for the oversight of 41 fielded mentors in 16 locations in the RC-East region. The Task Force Spartan fielded mentor CORs completed all six of the required audit checklists from January through June 2012; however, DCMA officials only maintained three of the six checklists in the central repository. The Task Force Spartan fielded mentor CORs did not perform the oversight to complete the audit checklists, but collected monthly performance assessment reports from IJC military personnel who worked directly with fielded mentors within their area of responsibility. The fielded mentor CORs compiled all the assessments obtained into one audit checklist and submitted the checklist monthly to the RC-East official.

To facilitate the collection of oversight information, the Task Force Spartan fielded mentor CORs used an IJC monthly performance assessment report template. However, the template did not include the information necessary to complete an audit checklist. Rather, the performance assessment reports required the military units to rate and provide comments on three general categories covering the fielded mentor's quality of service, mentor relations, and suggested improvements not on the specific requirements outlined in the SOW. Therefore, the Task Force Spartan fielded mentor CORs did not collect adequate information to complete the audit checklists and properly identify performance issues or obtain input on fielded mentor services outlined in the contract requirements.

¹³ The fourth audit checklist was submitted by the QAR, who stated that the audit was not performed because the COR was on leave.

¹⁴ Two RC-East oversight personnel were nominated and appointed as Task Force Spartan CORs; however, the two CORs worked together to fill one COR position for the Task Force Spartan area of responsibility.

Additionally, the three audit checklists completed by the Task Force Spartan fielded mentor CORs and provided by DCMA did not comply with the DCMA Theater Quality Plan. For example, one question in the audit checklist states “Do the battalion mentoring teams (total of twelve positions) consist of two mentors to support the following staff functions: Logistical Support, Personnel Administration/Finance Support?” In April and May 2012, the fielded mentor COR responded to the requirement with a “yes” and a “not observed” and stated “Systems are continually improving.” According to the DCMA Theater Quality Plan, “yes” responses should detail what was evaluated, where, and in what manner. In addition, the DCMA Theater Quality Plan states that for a “not observed” response, the COR should explain the reason why as well as when the item would be assessed in the future. The fielded mentor COR response did not provide what was evaluated, where, and in what manner or why the requirement was not observed. Furthermore, the fielded mentor COR should not have answered the question with a “yes” if he did not observe the requirement. In addition, none of the responses in the three checklists indicated for which of the 16 locations the fielded mentor CORs responses applied. As a result, the assigned QAR could not identify to which locations the questions applied or whether contractors at the 16 locations were performing in accordance with contract requirements.

In another example, on May 13, 2012, U.S. military personnel working with the ANCOP fielded mentors in the RC-East region stated their unit had significant issues with the fielded mentors at their site in Gardez. Specifically, ANCOP U.S. military personnel stated the military needed someone to help the Afghans with conducting inventories, identifying shortages in logistics, and establishing accountability of equipment—responsibilities the contractor was not fulfilling. Requirement number 66 on the audit checklist specifically required the ANCOP fielded mentoring team to support staff functions and to develop effectiveness related to: operational planning, personnel administration/finance support, logistical support, and training. Five performance assessment reports submitted in April 2012 by ANCOP U.S. military personnel rated the fielded mentors as marginal in the areas of quality of service and mentor relations. Specifically, in one mentor’s April 2012 assessment, the narrative comment stated, “The EPM [Embedded Police Mentor] is either under-resourced or not motivated to answer the critical questions involved with aligning himself with staff functions in the 4th Kandak.” The April 2012 assessment showed no improvement since the January 2012 assessment for that specific mentor. However, no nonconformances were identified in the ANCOP section of the Task Force Spartan fielded mentor COR checklist for May 2012, which covered April 2012 services.

One of the Task Force Spartan fielded mentor CORs stated that he did not believe there was a nonconformance with the fielded mentors if the military unit and fielded mentors could not work together. However, if the contractor was not performing contract

Figure 2. ANCOP Fielded Mentor Site in RC-East



Source: DoD Office of Inspector General.

requirements, the COR should have marked nonconformances on the audit checklist. The ANCOP fielded mentor problems continued from January through April 2012, and DCMA did not take action to resolve the nonconformances.

RC-Southwest Audit Checklists

DCMA officials provided none of the 18 required audit checklists from January through June 2012 for the RC-Southwest.

Need to Develop an Oversight Strategy for Fielded Mentors

DCMA and IJC officials did not have an adequate strategy for oversight of the fielded mentors. In October 2011, DCMA and IJC officials developed an oversight strategy, allocating 22 IJC COR billets throughout Afghanistan, which was intended to cover IJC fielded mentor services on the contract. However, DCMA and IJC did not implement a process to identify, nominate, and appoint fielded mentor CORs for all fielded mentor services or identify and correct gaps in oversight.

Additionally, DCMA and IJC personnel did not establish a process to train and mentor the prospective fielded mentor CORs to ensure that the nominees fully understood the audit checklist requirements and could satisfactorily perform oversight of the contract. Furthermore, DCMA officials did not coordinate with IJC officials to implement a clear reporting strategy to collect all fielded mentor COR audit checklists. For example, the audit team collected 115 audit checklists from 20 IJC personnel in RC-Southwest from August 2011 through June 2012; however, DCMA only had one of those audit checklists in the central repository.

The audit team collected 115 audit checklists from 20 IJC personnel in RC-Southwest from August 2011 through June 2012; however, DCMA only had one of those audit checklists in the central repository.

DCMA had two audit checklists for all oversight efforts in RC-Southwest, which included one of the 115 audit checklists received from IJC personnel. The two audit checklists in DCMA's central repository were from two RC-Southwest oversight personnel who were nominated—but never appointed—as CORs for the contract. The ACO appointed one of the 20 RC-Southwest oversight personnel who completed checklists as a COR; however, none of the 26 audit checklists the appointed COR completed were in DCMA's central repository.

From June 2011 through June 2012, DCMA delegated oversight duties for RC-Southwest to three QARs. However, the QARs were unable to assess whether the RC-Southwest checklists completed were in accordance with the DCMA Theater Quality Plan because RC-Southwest oversight personnel completed 114 out of 115 audit checklists outside of the DCMA oversight process. Without having the audit checklists in DCMA's central repository, QARs did not have access to them to assess contractor performance.

In July 2012, we informed the newly appointed QAR for RC-Southwest that some military personnel in the RC-Southwest region were completing one audit checklist per fielded mentor at every location. The RC-Southwest QAR stated he would expect the fielded mentor CORs to fill out one audit checklist per location for the fielded mentors at the specific site. We also informed the RC-Southwest QAR that other fielded mentor CORs, specifically in the RC-East region, were completing one audit checklist for multiple sites. The RC-Southwest QAR stated DCMA should not be compiling data from different sites into one audit checklist because it would be too difficult to pinpoint the location where deficiencies were identified. The RC-Southwest QAR further stated that issues should be identified at each specific location so DCMA could track deficiencies by location.

IJC officials should establish a process to identify and nominate fielded mentor CORs for all fielded mentor services. Additionally, DCMA officials should establish a strategy to appoint CORs for all fielded mentor services, collect all COR checklists for fielded mentor services, and identify and correct gaps in oversight.

QARs Need to Provide Training and Review Audit Checklists for Fielded Mentor Services

The fielded mentor COR checklists were not adequate because the QARs did not always provide the proper training to fielded mentor CORs or review and follow up on audit checklists received from the CORs. The DCMA Theater Quality Plan requires QARs mentor CORs and evaluate and approve COR audit checklists to ensure DCMA quality standards are met.

Fielded Mentor COR Training

The QARs did not always properly train fielded mentor CORs. For example, while performing a validation audit in March 2012, a nominated RC-Capital fielded mentor COR asked the QAR questions about which fielded mentors he was responsible for at his training site. The QAR directed the nominated COR to the IJC Logistics Officer to obtain an answer. However, the IJC Logistics Officer was on leave and did not respond to the COR. The ACO appointed the RC-Capital fielded mentor COR on April 7, 2012, without verifying the COR fully understood his responsibilities for fielded mentoring services. The QAR should have trained the COR on his contract-specific responsibilities before appointing the COR and should have been able to assist the COR when he had questions. On May 20, 2012, 43 days after the RC-Capital COR was appointed, the IJC Logistics Officer informed him he was responsible for providing oversight of all fielded mentors in the Kabul area.

In another example, the QAR who was responsible for providing oversight and COR management in RC-Southwest from April 2012 to June 2012 did not provide any training to RC-Southwest fielded mentor oversight personnel. Furthermore, some oversight personnel in RC-Southwest were completing one audit checklist per fielded mentor at every location; however, the audit checklist was not intended to assess individual contractor personnel. Conversely, fielded mentor CORs in the RC-East region were

completing one audit checklist for multiple sites, which did not allow QARs to identify contractual deficiencies at individual fielded mentor sites. Fielded mentor oversight personnel were not completing audit checklists that the QARs could use to adequately measure contractor performance because the QARs had not properly trained the oversight personnel. DCMA officials should establish a process to require QARs to adequately train fielded mentor CORs and implement procedures for CORs to complete fielded mentor checklists.

QAR Reviews of Fielded Mentor Audit Checklists

The QARs did not always review and follow up on audit checklists received from the fielded mentor CORs. For example, the QAR commented on the April and May 2012 Gardez fielded mentor audit checklists by stating that he reviewed them. Although the QAR stated he reviewed the audit checklists, the QAR did not follow up with the fielded mentor COR to clarify that the COR, rather than the contractor regional supervisor, was responsible for providing oversight of the fielded mentors in the Gardez region. DCMA officials should establish a process to require QARs to consistently review COR checklists in accordance with DCMA guidance.

Conclusion

DCMA and IJC officials had limited assurance that the Army received contracted fielded mentor services for the ANCOP, Afghan Uniform Police, and Afghan Border Patrol in remote and isolated headquarters, regional, provincial, and district locations throughout Afghanistan. DCMA personnel must properly appoint and train fielded mentor CORs as well as review all fielded mentor audit checklists to help overcome the challenges in performing services in remote and dangerous locations throughout Afghanistan. Additionally, establishing a consistent fielded mentor oversight strategy will improve contract oversight for all fielded mentor services on the ANP contract.

Recommendations, Management Comments, and Our Response

C.1. We recommend that the Commander, U.S. Forces-Afghanistan, establish and implement a fielded mentor oversight strategy to identify and nominate fielded mentor contracting officer's representatives for all fielded mentor services.

International Security Assistance Force Joint Command Comments

The Inspector General, IJC, responding for the Commander, U.S. Forces-Afghanistan, agreed with our recommendation, stating that the Afghan National Security Forces Directorate within IJC implemented a monthly program requiring audits beginning at the Security Force Assistance Advisory Team level. He stated that the findings and results would be reviewed and consolidated onto one checklist. He also stated that the findings for each requirement would be documented appropriately and, once documented and reviewed, results and findings would be forwarded to DCMA.

Our Response

Comments from the Inspector General, International Security Assistance Force Joint Command were responsive, and proposed actions met the intent of the recommendation. In addition to the comments provided by the Inspector General, IJC, the Acting Commander, DCMA-International, in response to Recommendation C.2.d, stated that DCMA-Afghanistan personnel will train the primary CORs and intermediary CORs, then use a train-the-trainer approach for field-level CORs. The Acting Commander also stated that DCMA will review a minimum of one audit per COR per month for thoroughness and adequacy. Therefore, IJC and DCMA-Afghanistan have implemented a fielded mentor oversight strategy, which includes identifying fielded mentor CORs. No further comments are required.

C.2. We recommend that the Commander, Defense Contract Management Agency-Afghanistan:

a. Establish and implement a strategy to appoint contracting officer's representatives for all fielded mentor services.

Defense Contract Management Agency-International Comments

The Acting Commander, DCMA-International agreed with our recommendation, stating that it is the requiring activities' responsibility to provide and nominate the required number of qualified CORs. The Acting Commander stated that DCMA has an effective process in place to appoint the properly nominated CORs. He explained that DCMA-Afghanistan uses the Office of the Secretary of Defense mandated COR tracking tool to track COR nominations, training documentation, and complete ACO appointments of all CORs. The Acting Commander added that DCMA-Afghanistan notifies the contracting officer and the requiring activity of COR vacancies.

Our Response

Comments from the Acting Commander, DCMA-International were responsive, and no additional comments are required.

b. Establish and implement procedures to enable contracting officer's representatives to consistently and thoroughly complete fielded mentor audit checklists.

Defense Contract Management Agency-International Comments

The Acting Commander, DCMA-International agreed with our recommendation, stating that the DCMA-Afghanistan quality assurance surveillance plan maintained and updated by DCMA-Afghanistan quality assurance personnel identifies the appointed CORs that are assigned for each fielded mentor audit. He stated that the lead QAR and product QARs monitor the plan, and metrics are generated throughout the month to ensure that fielded mentor audit checklists are completed consistently. The Acting Commander added that QARs, Government technical product representatives, and product QARs determine the thoroughness once audits are submitted. In addition, he stated that DCMA-

Afghanistan quality assurance personnel will review audits submitted by the intermediary CORs and the primary CORs for completeness and provide feedback as necessary.

After we received comments, we requested a copy of the quality assurance surveillance plan referenced in response to the recommendation. DCMA-International personnel provided a copy of the plan and stated that the document was not an ANP contract-specific quality assurance surveillance plan; however, it was an overarching spreadsheet that tracked all contracts requiring surveillance and was used by the DCMA quality personnel throughout Afghanistan. The spreadsheet provided included rows demonstrating the required audits for the ANP contract, the QAR and COR assigned to complete each audit, the date of the last audit completed, the date of the next audit due, and the COR's redeployment date.

Our Response

Comments from the Acting Commander, DCMA-International, to include the quality assurance spreadsheet and explanation provided by DCMA-International after the initial response was provided, were responsive, and no additional comments are required.

c. Establish and implement a clear reporting strategy to collect all fielded mentor contracting officer's representative checklists and identify and correct gaps in oversight.

Defense Contract Management Agency-International Comments

The Acting Commander, DCMA-International agreed with our recommendation, stating that DCMA-Afghanistan and IJC established a clear reporting strategy that ensures all fielded mentor checklists are completed and collected in a consistent, predictable manner. He explained that intermediary CORs will prepare an audit report each month that includes all mentor activities within their respective regional commands, and intermediary CORs will then submit their audit reports to IJC headquarters, where the primary COR will consolidate the audit reports and provide them to DCMA-Afghanistan. The Acting Commander added that audit checklist completion will be tracked by the primary COR at IJC, the DCMA-Afghanistan lead QAR, and the product QAR using the quality assurance surveillance plan and audit completion reports exported from the audit database. He explained that this tracking will allow DCMA-Afghanistan, TPSO, and IJC to identify and correct gaps in oversight.

Our Response

Comments from the Acting Commander, DCMA-International were responsive, and no additional comments are required.

d. Establish and implement a process to require quality assurance representatives to adequately train fielded mentor contracting officer's representatives and consistently review contracting officer's representative checklists in accordance with Defense Contract Management Agency guidance.

Defense Contract Management Agency-International Comments

The Acting Commander, DCMA-International agreed with our recommendation, stating that the process for training CORs is well established. He added that inconsistent access to the nominated CORs by QARs and Government technical product representatives limited the effectiveness of the process. The Acting Commander explained that if the CORs are not available to the QARs or Government technical product representatives due to operational risks and transportation issues, they cannot accomplish the Phase II training. He stated that when face-to-face access to the CORs is not possible for the Phase II training and COR validation audit, the training can only be accomplished through e-mail exchanges and telephone calls, which is inherently less effective, but the only option that is available at the time.

The Acting Commander stated that for fielded mentor CORs, DCMA-Afghanistan will train the primary CORs and the intermediary CORs, and use a train-the-trainer approach for the field level CORs. He explained that in these circumstances, the intermediary CORs will train the field-level CORs and hold them accountable to provide the required surveillance data. The Acting Commander also stated that DCMA-Afghanistan will in turn hold the primary COR and intermediary CORs accountable by providing timely and specific feedback to each COR and their supervisors on a monthly basis. He explained that DCMA-Afghanistan personnel at Camp Eggers, Afghanistan, will train the intermediary CORs and primary CORs on contract-specific requirements and expectations and will review a minimum of one audit record per COR each month for thoroughness and adequacy. The Acting Commander also stated that the DCMA-Afghanistan ACO will appoint each intermediary COR and primary COR upon satisfactory completion of training.

Our Response

Comments from the Acting Commander, DCMA-International were responsive, and no additional comments are required.

Finding D. Red River Army Depot CORs Were Not Providing Effective Oversight

NTM-A/CSTC-A and the Red River Army Depot (RRAD) personnel nominated six CORs who we interviewed that were not effectively providing oversight of the ANP contract. This occurred because NTM-A/CSTC-A personnel developed a memorandum of agreement with RRAD that did not identify appropriate COR qualifications. As a result, contractor performance at ANP training sites where the six RRAD CORs were appointed was not adequately measured and assessed.

COR Memorandum of Agreement

NTM-A/CSTC-A and RRAD issued a memorandum of agreement on March 12, 2011, and reissued the memorandum with minor revisions on December 5, 2011. Its purpose was to establish a cooperative relationship between NTM-A/CSTC-A and RRAD for filling contract oversight and surveillance personnel positions in Afghanistan and to develop cross-organizational communication and administrative processes for timely fills, backfills, extensions, personnel overlap, and funding processes. The memorandum stated that NTM-A/CSTC-A lacked the personnel to provide surveillance at contract locations. In those cases, NTM-A/CSTC-A provided funding to RRAD¹⁵ to hire trained CORs to fill the shortfall.

COR Nomination Process

NTM-A/CSTC-A personnel stated that when a COR billet needs to be filled, the RRAD liaison officer sends resumes from RRAD employees to TPSO personnel. The TPSO personnel review the resumes and select a COR. TPSO personnel stated that NTM-A/CSTC-A personnel nominate the COR, who is then appointed by DCMA.

Nominated and Appointed CORs Were Ineffective

NTM-A/CSTC-A and RRAD personnel did not nominate CORs who could effectively provide oversight of the ANP contract. Personnel from the NTM-A/CSTC-A Contract Management and Oversight Office stated that the quality of performance by RRAD CORs was a “mixed bag,” and if the requirements owners identified issues with the RRAD CORs, they should contact the Contract Management and Oversight office to remedy the situation.

TPSO personnel stated a RRAD COR was removed from her surveillance responsibilities at CTC Kabul on August 21, 2011, because she refused to come out of her living quarters to conduct audits. TPSO personnel also stated a COR was removed from RTC Helmand because he did not adequately perform his COR duties. The COR needed remedial training and was transferred to RTC Herat to conduct oversight. However, the COR still

¹⁵ RRAD’s mission is to conduct ground combat and tactical system sustainment maintenance operations and related support services worldwide, for U.S. and allied forces and friendly nations in support of the warfighter.

did not perform all of his assigned duties and did not complete the trainer/mentor checklist. The COR was not removed for cause but was redeployed after 6 months in Afghanistan. After our site visits, the ACO removed an additional RRAD COR from his surveillance responsibilities for cause. NTM-A/CSTC-A personnel stated that on August 5, 2012, the RRAD COR was removed from RTC Helmand for not being actively involved in monitoring the contractor's performance, not attending coordination meetings between the requirements owner and the contractor, and not actively managing problems between the requirements owner and the contractor.

CORs Needed to Be Better Qualified

NTM-A/CSTC-A personnel developed a memorandum of agreement with RRAD that did not identify appropriate COR qualifications. Federal Acquisition Regulation 1.602-2(d)(3), "Responsibilities," states that, "A COR must be qualified by training and experience commensurate with the responsibilities to be delegated in accordance with department/agency guidelines." The "must have" experience should be prior COR or quality assurance work experience; however, the memorandum did not include this requirement. Additionally, the COR Handbook states that the COR should have technical expertise in the services being performed.

The memorandum of agreement required the CORs to be trained, qualified, and capable of working with little direct supervision. However, the memorandum did not specify the qualifications that would lead to successful oversight of training and life support functions. Specifically, the memorandum required that the CORs be willing and able to leave the base to conduct surveillance and that CORs assigned to life support service missions have previous construction; electrical; heating, ventilation, and air conditioning; and plumbing experience.

The memorandum did not specify the qualifications that would lead to successful oversight of training and life support functions.

The memorandum further stated that previous deployed experience was desirable. However, four of six RRAD CORs we interviewed were previously Mine-Resistant, Ambush-Protected vehicle mechanics whose skills were not transferrable to a contract that provided training and life support for ANP students. For example, a COR nominated and appointed to the Training Sustainment Site-Lonestar, where the contractor conducted life support services, did not have any previous construction; electrical; heating, ventilation, and air conditioning; and plumbing experience as required. The COR did not complete any of her nine audit checklists for May and June 2012, in accordance with DCMA guidance, while assigned to Training Sustainment Site-Lonestar. In another example, a RRAD COR with no prior COR or quality assurance experience did not complete any of his 13 audit checklists for May and June 2012, in accordance with DCMA, while assigned to RTC Herat.

Of the six RRAD CORs we interviewed, three stated they had previous quality assurance experience; however, none had prior COR experience. One of those RRAD CORs did not complete audit checklists in accordance with DCMA criteria, although his audit checklists were more thorough and detailed than the audit checklists completed by CORs

without prior quality assurance experience. Another RRAD COR with quality assurance experience thoroughly completed 1 months' worth of audit checklists, but then copied and pasted the majority of the audit checklist from one month to the next. In contrast, the COR at CTC Kabul stated she had prior life support services quality assurance experience, was directly hired by NTM-A/CSTC-A, and had no affiliation with RRAD. The COR adequately completed all eight audit checklists required for May and June 2012 at CTC Kabul.

A newly appointed COR is likely to have limited success in thoroughly documenting contractor weaknesses without previous oversight or quality assurance experience. Therefore, the NTM-A/CSTC-A Director of Contract Management and Oversight should rescind the memorandum, as it does not include the qualifications necessary to perform oversight of the ANP contract. Instead, the NTM-A/CSTC-A Director of the Training Program and Support Office should coordinate with requirement owners to nominate CORs with COR or quality assurance experience or both.

A newly appointed COR is likely to have limited success in thoroughly documenting contractor weaknesses without previous oversight or quality assurance experience.

Conclusion

NTM-A/CSTC-A and RRAD personnel selected CORs who were not effectively performing oversight of the ANP contract. The CORs from RRAD did not have the experience necessary to provide adequate oversight of life support, training, and security services without direct supervision. The memorandum of agreement between NTM-A/CSTC-A and RRAD should have included the criteria that the CORs must have prior COR or quality assurance experience to be nominated as a COR on the ANP contract.

Recommendations, Management Comments, and Our Response

D.1. We recommend that the North Atlantic Treaty Organization Training Mission-Afghanistan/Combined Security Transition Command-Afghanistan, Director of Contract Management and Oversight, rescind the North Atlantic Treaty Organization Training Mission-Afghanistan/Combined Security Transition Command-Afghanistan and Red River Army Depot memorandum of agreement as it does not include the qualifications necessary to perform oversight of the ANP contract.

Combined Security Transition Command-Afghanistan Comments

The Deputy Commanding General, CSTC-A, responding for the NTM-A/CSTC-A, Director of Contract Management and Oversight, did not agree with the recommendation. He stated that the memorandum of agreement between NTM-A/CSTC-A and RRAD that was signed December 2, 2011, will remain in effect pending an update. The Deputy

Commanding General also stated that the memorandum of agreement is pending update for fiscal year 2014 and will incorporate changes to address previous COR and QAR experience to ensure hiring the best applicants. Additionally, he stated that in January 2013, all RRAD CORs assigned to the ANP contract attended mandatory COR refresher training provided by DCMA.

Our Response

Although the Deputy Commanding General did not agree with our recommendation, the actions proposed met the intent of the recommendation. No additional comments are required; however, we request the Deputy Commanding General provide a copy of the memorandum of agreement that addresses hiring CORs with previous COR or quality assurance experience when it is finalized and signed by NTM-A/CSTC-A and RRAD personnel.

D.2. We recommend that the North Atlantic Treaty Organization Training Mission-Afghanistan/Combined Security Transition Command-Afghanistan, Director of the Training Program Support Office, coordinate with requirement owners to nominate contracting officer's representatives that have prior contracting officer's representative or quality assurance experience or both.

Combined Security Transition Command-Afghanistan Comments

The Deputy Commanding General, CSTC-A, responding for the NTM-A/CSTC-A, Director of TPSO, agreed with our recommendation that requirement owners nominate CORs that have prior COR or quality assurance experience. He stated that TPSO will work with all requirements owners to ensure that they are aware of the Deputy Secretary of Defense Memorandum, "Monitoring Contract Performance in Contracts for Services," dated August 22, 2008, which mandates the requiring activities to ensure that properly trained and ready CORs are assigned prior to contract award. The Deputy Commanding General stated that where RRAD is providing COR support, the nominee screening will consist of reviewing all applicant resumes for previous COR or quality assurance experience and only accepting the best qualified applicants. Additionally, he stated that at a minimum, all CORs identified by the requiring activities will meet the levels identified within the Under Secretary of Defense Memorandum, "DoD Standard for Certification of Contracting Officer's Representatives (COR) for Service Acquisitions," dated March 29, 2012.

Our Response

Comments from the Deputy Commanding General, CSTC-A were responsive, and no additional comments are required.

Appendix A. Scope and Methodology

We conducted this performance audit from March 2012 through March 2013 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

This is the second in a series of audits on contract W91CRB-11-C-0053, the ANP training/mentoring and logistics support contract. We reviewed the basic ANP contract, awarded December 20, 2010, to DynCorp, and 21 subsequent contract modifications, dated February 7, 2011, through September 28, 2012. We reviewed contract files, including ANP contract invoices, DCMA-created audit checklists, the contractor's quality assurance surveillance plan, SOW modifications, DCMA contract administration delegations, DCMA-Afghanistan specific guidance, and e-mail correspondence. We focused our review of COR oversight on 12 ANP training/mentoring locations and 3 ANP fielded mentor regions for the period January 2012 through June 2012. We reviewed the Federal Acquisition Regulation, Defense Federal Acquisition Regulation Supplement, DoD Memoranda, and DCMA criteria specific to the oversight of the ANP contract.

We determined the universe of all ANP training/mentoring and logistics support sites in Afghanistan as of March 2012 and non-statistically selected 12 training/mentoring sites out of 23 total sites and 3 of the 6 fielded mentor regions to review for proper QAR and COR oversight. We selected 10 ANP locations that had a COR onsite and 2 locations that did not have a COR appointed as of May 2012 to determine whether a lack of oversight personnel at the training locations affected contract performance. Our evaluation of training and mentoring sites was based on whether the site was expected to close, area-specific security concerns, and travel restrictions. We visited at least one training site in each of the six regions of Afghanistan. We interviewed oversight personnel and contractor personnel, and we reviewed contract documentation for the following training locations (see Appendix C for map):

- Afghan MoI
- CTC Kabul
- O-4 Compound
- RTC Bamiyan (no COR onsite)
- RTC Gardez
- RTC Herat
- RTC Kandahar
- RTC Konduz
- RTC Helmand
- RTC Jalalabad (no COR onsite)
- RTC Mazar-e-Sharif
- Training Sustainment Site Lonestar

In addition, we interviewed fielded mentor oversight personnel and reviewed contract documentation for fielded mentor work performed in RC-Capital, RC-East, and RC-Southwest. We also conducted site visits and interviewed contracting, oversight, and program personnel from NTM-A/CSTC-A, DCMA-Afghanistan, ACC-RI, and IJC to understand the oversight reporting processes and procedures for the ANP contract.

We reviewed 166 DCMA audit checklists completed from January through June 2012. We reviewed each checklist to determine whether DCMA personnel met the Theater Quality Plan requirements for completing checklists. We used auditor judgment to conclude that DCMA personnel adequately completed the overall audit checklist if 75 percent or more of the individual answers to the questions met the Theater Quality Plan requirements; if the overall checklist stated when, where, and how the audit was performed; and if the checklist documented who performed the audit.

Use of Computer-Processed Data

We relied on computer-processed data from the Electronic Document Access website, a web-based system that provides secure online access, storage, and retrieval of contracts and contract modifications to authorized users throughout DoD. We used contract documentation retrieved from the Electronic Document Access website to determine the total contract value and review the changes made to the ANP contract and SOW. We compared the documents we retrieved from the Electronic Document Access website to the documentation provided by contracting and program personnel during our site visits and verified that the documentation we retrieved from the Electronic Document Access website was accurate.

As a result of our analysis, we determined that the Electronic Document Access website was sufficiently reliable for the purpose of meeting our audit objectives and providing the necessary documents to answer our audit steps for the ANP contract.

Use of Technical Assistance

The DoD IG Quantitative Methods Division assisted with the audit. Specifically, Quantitative Methods Division personnel provided the audit team with guidance regarding non-statistically selecting ANP training and mentoring sites to include in our review.

Prior Coverage

During the last 5 years, the Government Accountability Office (GAO), DoD IG, and the Department of State Inspector General (DOS IG) have issued nine reports discussing ANP challenges and oversight issues. Unrestricted GAO reports can be accessed over the Internet at <http://www.gao.gov>. Unrestricted DoD IG reports can be accessed at <http://www.dodig.mil/audit/reports>. Unrestricted DOS IG reports can be accessed at <http://www.oig.state.gov>.

GAO

Report No. GAO 12-293R, "Afghan Security: Department of Defense Effort to Train Afghan Police Relies on Contractor Personnel to Fill Skill and Resource Gaps," February 23, 2012

Report No. GAO 11-402R, "Multiple U.S. Agencies Provided Billions of Dollars to Train and Equip Foreign Police Forces," April 27, 2011

Report No. GAO-09-280, "Afghanistan Security: U.S. Programs to Further Reform Ministry of Interior and National Police Challenged by Lack of Military Personnel and Afghan Cooperation," March 9, 2009

DoD IG

Report No. DODIG-2012-094, "Afghan National Police Contract Requirements Were Not Clearly Defined but Contract Administration Improved," May 30, 2012

Report No. SPO-2011-003, "Assessment of U.S. Government Efforts to Train, Equip, and Mentor the Expanded Afghan National Police," March 3, 2011

Report No. D-2010-042, "DoD Obligations and Expenditures of Funds Provided to the Department of State for the Training and Mentoring of the Afghan National Police," February 9, 2010

DOS IG and DoD IG

Report No. AUD/CG-11-44 and DoD Report No. D-2011-102, "Afghan National Police Training Program Would Benefit From Better Compliance with the Economy Act and Reimbursable Agreements," August 25, 2011

Report No. AUD/CG-11-42 and DoD Report No. D-2011-095, "Afghan National Police Training Program: Lessons Learned During the Transition of Contract Administration," August 15, 2011

Report No. AUD/CG-11-30 and DoD Report No. D-2011-080, "DoD and DOS Need Better Procedures to Monitor and Expend DoD Funds for the Afghan National Police Training Program," July 7, 2011

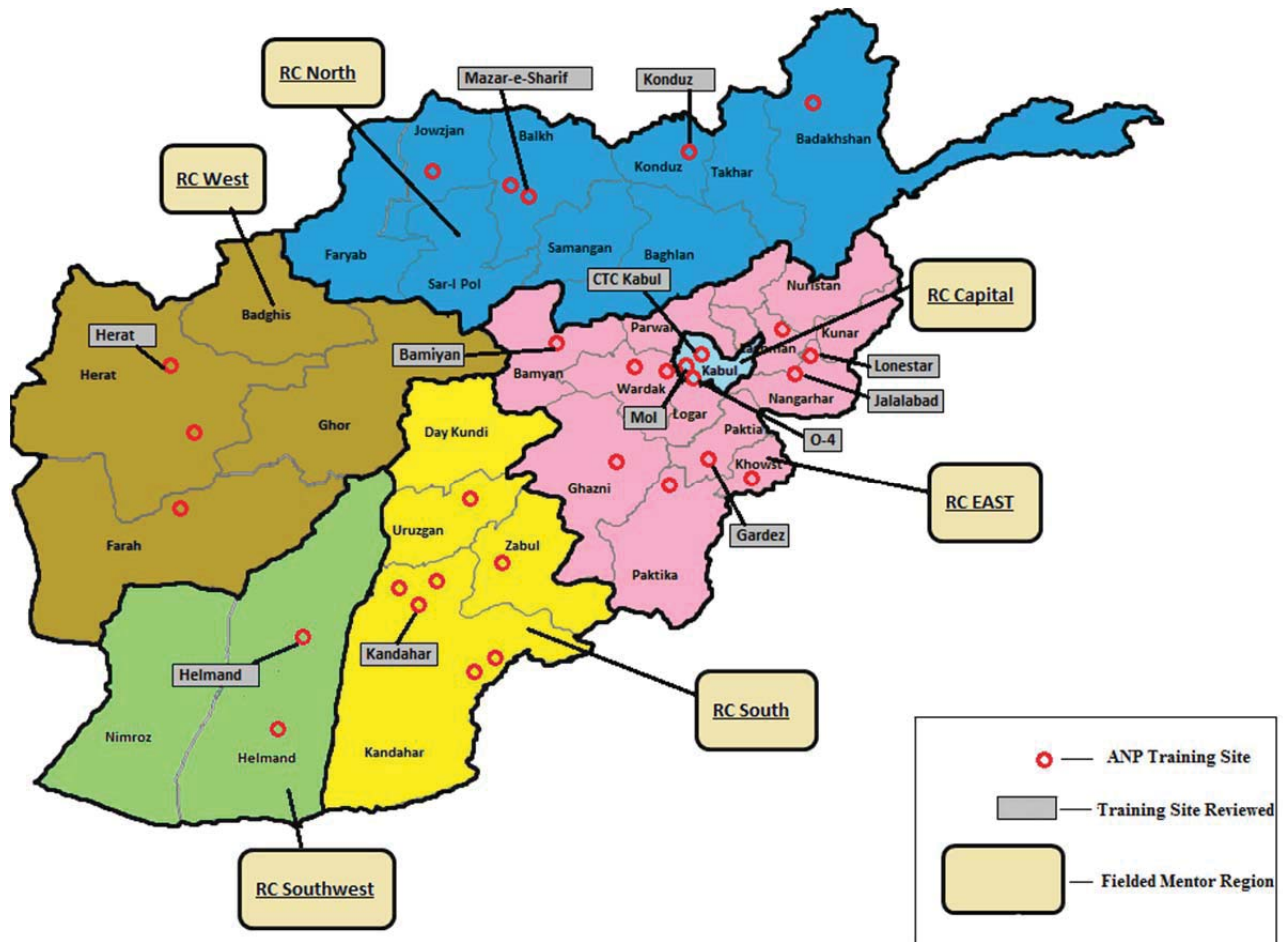
Appendix B. Monthly Oversight Performed at Sites Visited

Training Site	Type of Checklist	Month 2012											
		January		February		March		April		May		June	
Mazar-e-Sharif	FPS			X				X					
	FSO			X				X					
	TMS												
	BLS			X				X					
CTC Kabul	FPS			X						X	X	X	X
	FSO	X		X						X		X	
	TMS												
	BLS			X						X		X	
MOI	FPS												
	FSO												
	TMS	X		X				X		X		X	
	BLS												
0-4 Compound	FPS												
	FSO												
	TMS											X	
	BLS												
RTC Herat	FPS		X		X		X			X	X	X	X
	FSO	X								X		X	
	TMS											X	
	BLS	X		X		X				X		X	
RTC Gardez	FPS	X	X	X	X					X	X	X	X
	FSO	X		X						X		X	
	TMS												
	BLS	X		X						X		X	
RTC Bamiyan	FPS												
	FSO	X								X			
	TMS												
	BLS	X								X			
RTC Helmand	FPS	X	X	X	X	X		X	X	X	X	X	X
	FSO	X		X		X		X		X		X	
	TMS	X		X		X				X		X	
	BLS	X		X		X		X		X			
RTC Konduz	FPS	X	X				X	X	X	X	X		
	FSO	X						X		X			
	TMS	X	X										
	BLS	X						X		X			
TSS Lonestar	FPS	X	X	X	X		X	X	X		X	X	X
	FSO	X		X				X		X		X	
	TMS	X		X						X		X	
	BLS	X		X				X		X		X	
RTC Jalalabad	FPS	X	X	X	X			X	X	X			
	FSO	X		X				X		X			
	TMS												
	BLS			X				X		X			
RTC Kandahar	FPS		X	X	X	X	X	X	X	X	X	X	X
	FSO			X		X		X		X		X	
	TMS	X		X		X				X		X	
	BLS			X		X		X		X		X	

X	Oversight Performed
	Training Site Closed
	Oversight Not Required

Total Checklists Required	287
Total Checklists Completed	166
Total Checklists Not Completed	121

Appendix C. Map of ANP Training Sites and Fielded Mentor Regions



Appendix D. Regional Command-Southwest Oversight Personnel and COR Appointment Status

IJC Oversight Personnel			DCMA Records		
Number	Oversight Timeframe	Checklists Completed	Date Nominated	Date Appointed	Redeployment Date
1	December 2011	2	Not Provided	Not Provided	Not Provided
2	August 2011, October 2011	2	6/21/2011	Not Provided	December 2011
3	December 2011 through March 2012	5	Not Provided	Not Provided	Not Provided
4	December 2011 through March 2012	10	Not Provided	Not Provided	Not Provided
5	October 2011	1	6/21/2011	Not Provided	November 2011
6	May 2012	1	Not Provided	Not Provided	Not Provided
7	August 2011 through November 2011	26	8/22/2011	11/26/2011	February 2012
8	December 2011 through April 2012	5	Not Provided	Not Provided	Not Provided
9	May 2012	1	Not Provided	Not Provided	Not Provided
10	November 2011	1	Not Provided	Not Provided	Not Provided
11	November 2011 through December 2011	2	Not Provided	Not Provided	Not Provided
12	January 2012 through April 2012	4	Not Provided	Not Provided	Not Provided
13	November 2011 through April 2012	6	Not Provided	Not Provided	Not Provided
14	December 2011 through April 2012, June 2012	31	Not Provided	Not Provided	Not Provided
15	August 2011 through November 2011	4	6/4/2011	Not Provided	February 2012
16	May 2012	1	Not Provided	Not Provided	Not Provided
17	April 2012 through May 2012	6	Not Provided	Not Provided	Not Provided
18	December 2011	1	Not Provided	Not Provided	Not Provided
19	April 2012	1	Not Provided	Not Provided	Not Provided
20	April 2012	5	3/17/2012	Not Provided	March 2013
Total Reports Completed:		115			

International Security Assistance Force Joint Command Comments



Headquarters
International Security Assistance Force Joint Command
Kabul, Afghanistan
APO, AE 09320



IJC IG

02 May 2013

MEMORANDUM FOR USFOR-A

SUBJECT: IJC Response to DOD IG Draft Report D2012-D000AS-0137.000

1. IJC has reviewed the DOD IG Draft Report (D2012-D000AS-0137.000) "DoD Needs to Improve Oversight of the Afghan National Police Training/Mentoring and Logistics Support Contract." IJC concurs with the report's recommendations and provides one comment in the attached matrix.
2. Point of contact for this issue is [REDACTED]

Ronald McNamara [REDACTED]
RONALD W. McNAMARA
COL, USA
Inspector General

Attch:
(U) Comment Matrix

UNCLASSIFIED

<i>Comment Matrix – "DoD Needs to Improve Oversight of the Afghan National Police Training, Mentoring, and Logistics Contract Support" (137.000)</i>			
Page Number	Section	Recommendation	Justification
34	C1	The ANSF Directorate within IJC has implemented a monthly program requiring audits beginning at the SFAAT level. Findings/results will be reviewed and consolidated on to one checklist. Findings for each requirement will be documented appropriately. Once documented and reviewed, results/findings will be forwarded to DCMA.	Information

UNCLASSIFIED

Defense Contract Management Agency-International Comments



DEFENSE CONTRACT MANAGEMENT AGENCY
3901 A AVENUE, BUILDING 10500
FORT LEE, VA 23801-1809

APR 30 2013

MEMORANDUM FOR PROGRAM DIRECTOR, ACQUISITION AND CONTRACT
MANAGEMENT, OFFICE OF INSPECTOR GENERAL,
DEPARTMENT OF DEFENSE

SUBJECT: Draft Report Project No. D2012-D000AS-0137.000 "DoD Needs to Improve
Oversight of the Afghan National Police Training/Mentoring and Logistics Support
Contract," dated April 5, 2013

REFERENCE: Draft Report Project No. D2012-D000AS-0137.000

We have attached the Headquarters, Defense Contract Management Agency's comments
to the recommendation as requested in the subject draft report.

Point of contact for this audit is [REDACTED]
[REDACTED]

A handwritten signature in black ink, appearing to read "Frederick G. Kuhm", is positioned above the printed name.

Frederick G. Kuhm
Acting Commander, DCMA International

Attachments:
As stated

cc:
USD(AT&L)
ASD(A)

Draft Report Project No. D2012-D000AS-0137.000 "DoD Needs to Improve Oversight of the Afghan National Police Training/Mentoring and Logistics Support Contract," dated April 5, 2013

DCMA provides the following comments to the draft report.

RECOMMENDATION A.1: We recommend that the Commander, Defense Contract Management Agency-Afghanistan:

a. Review the lead quality assurance representative's and the quality assurance representative's performance related to oversight responsibilities for the Afghan National Police training contract to determine whether they properly managed contracting officer's representatives, created and updated audit checklists to reflect the requirements of the contract, and maintained oversight of the Afghan National Police training contract in accordance with the Theater Quality Plan requirements during the reporting period from January 2012 through June 2012 and, as appropriate, hold them accountable for deficient performance.

DCMA RESPONSE: Concur, DCMA Afghanistan (DCMA-A) determined the appropriate actions to be taken were in process improvements, not personnel action. DCMA-A processes were not as efficient and effective as desired on this contract during the period of time the audit was performed, thereby making it difficult for the quality assurance (QA) personnel to fully comply with their oversight responsibilities. DCMA-A has made improvements, including restructuring the Embedded Police Mentor (EPM) oversight efforts to improve command and control, increasing oversight checks on performed audits, and continuing assessment and improvement through Management Internal Control Reviews (MICRs).

b. Direct the lead quality assurance representative and the quality assurance representative for the Afghan National Police contract to:

(1) Provide the contracting officer's representatives with the appropriate oversight documentation as it applies to the sites where the contracting officer's representatives are assigned, as required by the Defense Contract Management Agency Theater Quality Plan and the Contracting Officer's Representative Management Guide.

DCMA RESPONSE: Concur, DCMA-A will perform in accordance with DCMA Quality Instructions and the DCMA-A Contracting Officer's Representative (COR) Management Guide. DCMA-A quality assurance representatives (QARs) and government technical product representatives (GTPRs) are responsible for verifying that CORs utilize current checklists and ensuring that CORs possess a copy of the most recent statement of work (SOW). QARs/GTPRs perform the verification by reviewing each non-EPM audit submitted by a COR before forwarding the audits up the DCMA-A chain. Additionally, to aid in determining the current services being performed, the DCMA-A product quality assurance representatives (PQARs) ensure that QARs, GTPRs and CORs receive the contractor's weekly Personnel Status (PERSTAT) reports. These reports identify the contractor personnel filling each required position and are compared to the most recent performance work statement (PWS) and notices to proceed (NTPs) to determine whether or not required positions are filled.

Draft Report Project No. D2012-D000AS-0137.000 “DoD Needs to Improve Oversight of the Afghan National Police Training/Mentoring and Logistics Support Contract,” dated April 5, 2013

(2) Implement an oversight strategy for the contractor’s program management office and the contract logistics warehouse.

DCMA RESPONSE: Concur, DCMA-A has incorporated Camp Pinnacle (DI PMO) and CTC Kabul (DI warehouse) into the Surveillance Plan and has been regularly auditing the activities at these locations since October 2012.

(3) In coordination with the Administrative Contracting Officer, identify and fill contracting officer’s representative vacancies in a timely manner.

DCMA RESPONSE: Concur, DCMA-A will continue to identify COR vacancies to the Training Program Support Office (TPSO) and (ISAF) Joint Command (IJC), the organizations responsible for providing (filling) the necessary CORs. In the dynamic environment of EPM, IJC will identify EPM COR needs by canvassing their Police Advisory Teams (PAT) for contractors and then nominate CORs accordingly. DCMA-A currently has adequate COR coverage for Afghan Ministry of Interior (MoI) and Institutional training/mentoring requirements. For the fielded police mentor program, COR coverage is currently inadequate. DCMA-A has identified these shortfalls to TPSO and IJC (requirement owner), and will appoint the required CORs when properly nominated personnel are identified to DCMA-A.

c. Direct the lead quality assurance representative to require the contractor to address all outstanding corrective action requests and internal corrective action requests related to contract health and safety requirements immediately and to address any new corrective action requests or internal corrective action requests related to contract health and safety requirements within 30 days of identification.

DCMA RESPONSE: Concur, currently DynCorp International only has five open internal corrective action requests (ICARs), with two related to health and safety requirements. Per the Theater Quality Plan (TQP) and DMCA Instruction for Corrective Action Process (CAP), DCMA issues a CAR to the contractor for any non-conformance. The CAR is issued within three (3) days of the identified non-conformance and the contractor has ten (10) calendar days to respond with a CAP. Upon receipt of the CAP, DCMA-A evaluates the adequacy of the contractor’s plan to address the identified deficiencies’ root cause and either accepts or rejects the plan. Follow-on audits are typically performed as necessary to validate that corrective actions from an accepted CAP have been implemented to effectively address the root cause and prevent reoccurrence.

DCMA-A regularly tracks ICARs and monitors how the contractor addresses non-conformances. DCMA-A receives bi-weekly updates on ICAR status and action plans to ensure that issues are addressed in a timely manner and any necessary procedures or processes are put in place to prevent reoccurrence. DCMA-A closely monitors Life, Health and Safety (LHS) related items. The Contractor’s Quality Control Plan requires internally identified deficiencies to be corrected within 30 days of occurrence. If the contractor fails to correct the deficiency within 30 days, DCMA-A retains the right to issue a CAR to the contractor.

Draft Report Project No. D2012-D000AS-0137.000 "DoD Needs to Improve Oversight of the Afghan National Police Training/Mentoring and Logistics Support Contract," dated April 5, 2013

RECOMMENDATION B.1: We recommend that the Commander, Defense Contract Management Agency-Afghanistan update the Defense Contract Management Agency Theater Quality Plan and remove the option for conducting an alibi audit.

DCMA RESPONSE: Concur, however Afghanistan is a dangerous war-zone environment with frequent communication difficulties and transportation to performance sites under this contract and others is unreliable. Every effort is made to complete audits as scheduled, but there may be instances when on-site or desk audit cannot be performed. In these instances it will be recorded as an audit not performed with documentation as to why it could not be performed and the efforts made to accomplish the audit.

RECOMMENDATION B.2: We recommend that the Commander, Defense Contract Management Agency-Afghanistan, establish a quality control process to verify that the Defense Contract Management Agency quality assurance representatives:

a. Validate that each contracting officer's representative is aware of the risk rating for the services provided at the site locations and knows the corresponding audit checklist requirements, including the number of audits required to be completed each month.

DCMA RESPONSE: Concur, existing processes were in place to fulfill this recommendation; however, they were not adhered to consistently. Currently DCMA-A QARs are sending updated audit checklists and the SOW, as well as providing guidance to CORs on risk ratings and the number of audits to be performed. Additionally, the new DCMA-A Service Tracker database provides an exportable Surveillance Plan in Microsoft Excel spreadsheet format that is distributed to DCMA-A QA personnel on a monthly basis, or more frequently if changes to the surveillance plan occur. The Surveillance Plans identify the audits required for each contract/site/service, along with the current risk rating for each. DCMA-A QA personnel distribute a copy of these Surveillance Plans to all CORs. This is evaluated during standards and evaluation (S&E) QAR evaluations of all DCMA-A QA personnel, as well as during Management Internal Control Reviews (MICRs) conducted by DCMA-A HQ staff members.

DCMA-A provides guidance on the audit checklists during COR training and through regular feedback with the CORs regarding their performance and expectations. DCMA-A provides feedback monthly based on evaluation factors found in the DCMA-A Standardization and Evaluation Audit Feedback Template. Furthermore, QAR personnel will grade one audit from each COR monthly according to the same standardized evaluation factors and provide this written feedback to the CORs and their supervisors. Finally, DCMA-A requires QAR/GTPR personnel to conduct quarterly validation audits with each assigned COR (in accordance with the TQP and DCMA Quality Instructions). For quarterly validation audits, there will be a mix of in-person and "virtual validations" over the phone, accomplished depending on the situation and time available.

Draft Report Project No. D2012-D000AS-0137.000 "DoD Needs to Improve Oversight of the Afghan National Police Training/Mentoring and Logistics Support Contract," dated April 5, 2013

b. Complete the required audit checklist when the contracting officer's representative is not available, in accordance with the Defense Contract Management Agency Theater Quality Plan.

DCMA RESPONSE: Concur, DCMA-A QAR and GTPR personnel make every effort to conduct audits when CORs are unavailable, but based on operational circumstances this is not always practical. In the event a DCMA-A QAR or GTPR cannot conduct a COR required audit or desk audit, they will complete and submit an alibi audit (audit not performed) document per the TQP.

c. Review all contracting officer's representatives audit checklists for completeness and return the audit checklists to the contracting officer's representatives, with feedback, as required by the Defense Contract Management Agency Contracting Officer's Representative Management Guide, if the quality assurance representatives finds that the contracting officer's representative did not do the following:

- (1) Provide comments that support the response given to the question.
- (2) Complete each section of the audit checklist required for the site.
- (3) Properly document when the contractor did not comply with the contract requirements.

DCMA RESPONSE: Concur, DCMA is currently enhancing the process for QA oversight of the TPSO contracts to improve assessment of the COR completed audits. These enhancements include increased reviews, a centralization of oversight activities at Camp Eggers, and random sampling by tertiary command S&E QARs.

d. Provide contract-specific Phase II training to all contracting officer's representatives assigned to the Afghan National Police contract in accordance with the Defense Contract Management Agency Theater Quality Plan and Contracting Officer's Representatives Management Guide before sending the contracting officer's representatives to their assigned sites.

DCMA RESPONSE: Concur, contract-specific Phase II training is a DCMA-A requirement instituted from experience gained administering these types of complex service contracts. This is not a DoD standard or requirement. DCMA-A makes every effort to provide contract-specific Phase II training to all CORs whenever possible. There were two primary contributing factors to many of the CORs on this contract not receiving adequate Phase II training during the period covered by this audit report. First, DCMA-A personnel often lacked access to the performance sites due to operational risks and lack of transportation availability. Second, DCMA-A personnel had limited access to the CORs responsible for performing the direct oversight efforts on-site due to the first factor related to operational risks and lack of transportation. These two issues limited DCMA's ability to accomplish effective on-site, face-to-face Phase II training with many of the CORs. DCMA-A was limited in those cases to performing the necessary training via email exchanges and telephone conversations.

Draft Report Project No. D2012-D000AS-0137.000 "DoD Needs to Improve Oversight of the Afghan National Police Training/Mentoring and Logistics Support Contract," dated April 5, 2013

e. Provide the contracting officer's representatives the files of the previous contracting officer's representatives to review and fully understand the specific services the contractor performs at the assigned site.

DCMA RESPONSE: Concur, as directed in the COR appointment letter, it is the responsibility of the outgoing COR to provide a continuity book to the incoming COR in accordance with the TQP. It is the responsibility of the previous COR, their supervisor, and the COR's assigned unit to ensure that this exchange occurs. These files are frequently located in offices at sites that the DCMA-A QA personnel have limited or no capability to visit. If the previous COR's files become lost or destroyed, DCMA-A will then provide new CORs with all applicable contract documents, training material, audit checklists, and audit reports completed by the previous CORs.

RECOMMENDATION C.2: We recommend that the Commander, Defense Contract Management Agency-Afghanistan:

a. Establish and implement a strategy to appoint contracting officer's representatives for all fielded mentor services.

DCMA RESPONSE: Concur, however, it is the requiring activity/ supported unit's responsibility to provide and nominate the required number of qualified CORs. The procuring contracting officer appoints the original CORs when the administration of the contract is assigned to DCMA-A. DCMA-A's role is to train and appoint follow-on CORs after their nomination. DCMA has an effective process in place to appoint properly nominated CORs. DCMA-A uses the OSD mandated COR Tracking (CORT) tool to track COR nominations, training documentation, and complete administrative contracting officer (ACO) appointments of all CORs. This is a mandated process that DCMA-A follows. DCMA-A does notify the procuring contracting office and requiring activity/supported unit of COR vacancies.

b. Establish and implement procedures to enable contracting officer's representatives to consistently and thoroughly complete fielded mentor audit checklists.

DCMA RESPONSE: Concur, the DCMA-A quality assurance surveillance plan maintained and updated by DCMA-A QA personnel identifies the appointed CORs that are assigned against each fielded mentor audit. This plan is monitored by the lead QAR (LQAR) and PQARs and metrics are generated throughout the active month to ensure that fielded mentor audit checklists are completed consistently. QARs, GTPRs and PQARs determine the thoroughness once audits are submitted. DCMA-A QA personnel will review audits submitted by the intermediary CORs (ICORs) and the primary COR (PCOR) for completeness and provide feedback as necessary.

c. Establish and implement a clear reporting strategy to collect all fielded mentor contracting officer's representative checklists and identify and correct gaps in oversight.

Draft Report Project No. D2012-D000AS-0137.000 "DoD Needs to Improve Oversight of the Afghan National Police Training/Mentoring and Logistics Support Contract," dated April 5, 2013

DCMA RESPONSE: Concur, DCMA-A and IJC have established a clear reporting strategy that ensures all fielded mentor checklists are completed and collected in a consistent, predictable manner. ICORs will prepare an audit report each month encompassing mentor activities within their respective regional commands. ICORs will submit their audit reports to IJC Headquarters where the PCOR will consolidate and provide to DCMA-A Camp Eggers. Audit completion will be tracked by both IJC PCOR and DCMA-A LQAR and PQARs using QA surveillance plan and audit completion reports exported from our QA audit database. This tracking will allow DCMA-A, TPSO and IJC to identify and correct gaps in oversight.

d. Establish and implement a process to require quality assurance representatives to adequately train fielded mentor contracting officer's representatives and consistently review contracting officer's representative checklists in accordance with Defense Contract Management Agency guidance.

DCMA RESPONSE: Concur, the process for training CORs is well established. Its effectiveness, however, has been limited by inconsistent QAR/GTPR access to the nominated CORs. If the CORs are not available to the QARs/GTPRs due to operational risks and transportation issues, they cannot accomplish fully effective Phase II training. As a part of the Phase II training, DCMA-A QARs/GTPRs normally conduct the initial COR validation audit by traveling to the location of contractor performance where they will closely observe the COR's audit and provide direction as needed. The QAR/GTPR helps the COR complete the checklist and audit coversheet to ensure they understand how to complete the task. For quarterly validation audits, there is a mix of in-person and "virtual validations" over the phone depending on the situation and time available. When face-to-face access to the CORs is not possible, this training can only be accomplished via email exchanges and telephone calls, which is inherently less effective, but the only option sometimes available to DCMA-A in this theater of operations. DCMA-A, TPSO, and Red River Army Depot are committed to improving the capabilities of CORs through face-to-face audit validations and other training methods to the maximum extent possible.

For fielded mentor CORs, specifically, DCMA-A will train the PCOR and ICORs, and use a train-the-trainer approach for the field level auditors (the ICORs will train them and hold them accountable to provide required surveillance data). DCMA-A will in turn hold the PCOR and ICOR accountable by providing timely and specific feedback to each COR and their supervisors on a monthly basis. DCMA-A personnel located at Camp Eggers will personally train ICORs and PCORs on contract-specific requirements and expectations, as well as review a minimum of one audit record per COR each month for thoroughness and adequacy. The DCMA-A ACO will appoint each ICOR and PCOR upon satisfactory completion of training.

Combined Security Transition Command-Afghanistan Comments



NATO TRAINING MISSION - AFGHANISTAN
COMBINED SECURITY TRANSITION COMMAND – AFGHANISTAN
KABUL, AFGHANISTAN
APO AE 09356

REPLY TO
ATTENTION OF

CSTC-A

20 Apr 2013

MEMORANDUM THRU United States Forces - Afghanistan (CJIG), APO AE 09356
United States Central Command (CCIG), MacDill AFB, FL 33621

FOR: Office of the Department of Defense – Inspector General, 4800 Mark Center Drive,
Alexandria, VA 22350-1500


SUBJECT: NTM-A/CSTC-A Response to the Draft Report on, "DoD Needs to Improve
Oversight of the Afghan National Police Training/Mentoring and Logistics Support Contract"
(D2012-D000AS-0137.000).

REFERENCES: DoD IG Draft Report, dated 5 Apr 13

1. The purpose of this memorandum is to provide responses to Recommendations D.1 and D.2
in the subject report.

2. Point of contact for this action is [REDACTED]

Encl
Response to Draft Report


JONATHAN A. MADDUX
Brigadier General, U.S. Army
DCG CSTC-A

**NTM-A/CSTC-A
GENERAL COMMENTS ON THE FOLLOW UP**

“DoD Needs to Improve Oversight of the Afghan National Police Training/Mentoring and Logistics Support Contract” (D2012-D000AS-0137.000)

1. Recommendation D.1 states:

We recommend that the North Atlantic Treaty Organization Training Mission-Afghanistan/Combined Security Transition Command-Afghanistan, Director of Contract Management and Oversight, rescind the North Atlantic Treaty Organization Training Mission-Afghanistan/Combined Security Transition Command-Afghanistan and Red River Army Depot memorandum of agreement as it does not include the qualifications necessary to perform oversight of the ANP contract.

a. NTM-A/CSTC-A response to Recommendation D.1:

NTM-A/CSTC-A non-concurs with the recommendation. The Memorandum of Agreement (MOA) between NTM-A/CSTC-A and Red River Army Depot (RRAD), signed 2 December 2011 will remain in effect pending update. The current MOA formalized the agreement between NTM-A/CSTC-A and RRAD to provide government employees to provide contract oversight and surveillance in support of 800 Afghan Security Force Funds (ASFF) service and construction contracts valued in excess of \$5 Billion. The RRAD MOA is pending update for Fiscal Year 2014 and will incorporate changes to address previous COR and QAR experience to ensure hiring the best applicants that meet qualifications outlined in the DOD Standards for Certification of Contracting Officer's Representatives (COR) for Service Acquisition, dated March 29, 2010. Additionally, in January 2013, all RRAD CORs assigned to ANP maintenance contract attended mandatory COR refresher training provided by DCMA. This training was provided to update the CORs on contract requirements, reassess qualifications, and reinforce oversight procedures and performance effectiveness.

2. Recommendation D.2 state:

We recommend that the North Atlantic Treaty Organization Training Mission-Afghanistan/Combined Security Transition Command-Afghanistan, Director of the Training Program Support Office, coordinate with requirement owners to nominate contracting officer's representatives that have prior contracting officer's representative or quality assurance experience or both.

a. NTM-A/CSTC-A response to Recommendation D.2:

NTM-A/CSTC-A concurs with the recommendation that requirement owner's nominate Contracting Officer Representatives (CORs) that have prior contracting officer's representative or quality assurance (QA) experience or both. The Training Program Support Office (TPSO) will work with all requirement owners to ensure they are aware of the Deputy Secretary of Defense Memorandum, Subject: Monitoring Contract Performance in Contracts for Services, dated 22 Aug 2008, which mandates that requiring activities shall ensure that properly trained and ready CORs are assigned prior to contract award. In this area, we will work with the units to focus their nomination to those potential CORs with prior experience as a COR or QA, taking into consideration criticality and urgent need of the contract oversight actions. In instances where Red River Army Depot (RRAD) is providing COR support to the requirement owners, the nominee screening will consist of reviewing all applicant resumes for previous COR or QA experience and only accepting the best qualified applicants. Additional funding will be considered as a means by which to increase the

NTM-A/CSTC-A
GENERAL COMMENTS ON THE FOLLOW UP

“DoD Needs to Improve Oversight of the Afghan National Police Training/Mentoring and Logistics
Support Contract” (D2012-D000AS-0137.000)

number of potential candidates with enhance qualifications. As a minimum, all CORs identified by the requiring activities will meet the levels identified within the Under Secretary of Defense Memorandum, Subject: DoD Standard for Certification of Contracting Officer's Representatives (COR) for Service Acquisition, dated 29 Mar 2012.

APPROVED BY:

[REDACTED]

PREPARED BY:

[REDACTED]

Army Contracting Command Comments



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
HEADQUARTERS, U.S. ARMY MATERIEL COMMAND
4400 MARTIN ROAD
REDSTONE ARSENAL, AL 35898-5000

MAY - 8 2013

AMCIR

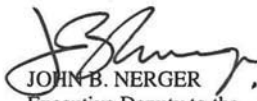
MEMORANDUM FOR Department of Defense Inspector General (DoDIG), ATTN:
Acquisition and Contract Management Division [REDACTED]
[REDACTED]

SUBJECT: Command Comments on DoDIG Draft Report; DoD Needs to Improve Oversight of
the Afghan National Police Training/Mentoring and Logistics Support Contract (Project No.
D2012AS-0137)

1. The US Army Materiel Command (AMC) has reviewed the subject draft report and the
response from the US Army Contracting Command (ACC). AMC endorses the enclosed ACC
response.

2. The AMC point of contact is [REDACTED]
[REDACTED]

Encl


JOHN B. NERGER
Executive Deputy to the
Commanding General



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
U.S. ARMY CONTRACTING COMMAND
3334A WELLS ROAD
REDSTONE ARSENAL, AL 35898-5000

AMSCC-IR

03 MAY 2013

MEMORANDUM FOR [REDACTED], Director, Internal Review and Audit Compliance
Office, Headquarters, U.S. Army Materiel Command, [REDACTED]
[REDACTED]

SUBJECT: DOD needs to Improve Oversight of the Afghan National Police Training/Mentoring
and Logistics Support Contract (Project No. D-2012-D000AS-0137.000) (D1329) (721)

1. References: Memorandum and Draft Audit Report, Office of Inspector General – Department
of Defense, 5 April 2013, subject as above.

2. The Army Contracting Command (ACC) concurs with the enclosed ACC-Rock Island (RI)
comments.

[REDACTED]

4. The ACC point of contact is [REDACTED]
[REDACTED]

Encl

CAMILLE M. NICHOLS
Major General, USA
Commanding



REPLY TO
ATTENTION OF:

CCRC

UNCLASSIFIED
DEPARTMENT OF THE ARMY
ARMY CONTRACTING COMMAND ROCK ISLAND
1 ROCK ISLAND ARSENAL
ROCK ISLAND, IL 61299-8000

22 APR 2013

FOR HQ, ACC-IR, Attn: [REDACTED]

SUBJECT: DoDIG Draft Report, "DoD Needs to Improve Oversight of the Afghan National Police Training/Mentoring and Logistics Support Contract" Project No. D2012-D000AS-0137.000

1. We have reviewed the subject report and provided further clarification to Recommendations A2a and A2b. Our comments are enclosed.

2. The POC is [REDACTED]

ENCL

John P. Hannon
JOHN P. HANNON
Colonel, United States Army
Acting Executive Director
Army Contracting Command - Rock Island

UNCLASSIFIED

ENCL

DoDIG Draft Report
Project No. D2012-D000AS-0137.000
DoD Needs to Improve Oversight of the Afghan
National Police Training/Mentoring and Logistics
Support Contract

Finding A - Contract Oversight Needs Improvement:

Recommendations:

A.2 We recommend that the Contracting Officer, Army Contracting Command-Rock Island:

a. Coordinate with the Combined Security Transition Command-Afghanistan Training Program Support Office, Program Manager, Afghan National Police training contract, and the Commander, Defense Contract Management Agency-Afghanistan, to review the Afghan National Police training contract oversight strategy, and:

(1) Determine whether the current oversight strategy is appropriate to oversee contractor performance on the Afghan National Police contract and modify the oversight strategy as required.

(2) Develop audit checklists or a quality assurance surveillance plan, or both, that includes which statement of work and contract requirements are critical to the success of the Afghan National Police contract. The Contracting Officer, Army Contracting Command-Rock Island, should subsequently coordinate with Training Program Support Office and Defense Contract Management Agency-Afghanistan personnel to update the audit checklists or quality assurance surveillance plan as necessary when the Afghan National Police contract statement of work is modified.

b. Coordinate with the lead quality assurance representative to develop and implement a strategy to consistently review contractor internal corrective action requests and take action on internal corrective action requests that are unresolved for more than 30 days.

Command comments:

Army Contracting Command-Rock Island (ACC-RI) concurs with the findings and provides the following comments to A.2a and A.2b:

A.2.a.: Since the contract formally transferred to ACC-RI, ACC-RI has been continuously working with the Training Program Support Office (TPSO) and Defense Contract Management Agency-Afghanistan (DCMA-A) to review and refine the oversight strategy to oversee contractor performance, and will continue to do so. In determining whether the current oversight strategy is appropriate, ACC-RI works with TPSO and DCMA-A on a recurring basis and recognizes that the process requires regular modifications due to the contingency environment and the frequency of changes to the Statement of Work (SOW) requirements. ACC-RI has determined that utilization of the audit checklists in lieu of a Quality Assurance Surveillance Plan (QASP) is adequate, and that it is vital that the checklists be regularly updated as the SOW is modified.

It is important to note that this contract was originally awarded by ACC-Aberdeen Proving Grounds (APG), not ACC-RI, and administration of this contract transferred to ACC-RI in August 2011. A QASP was developed by the contractor and submitted with its technical proposal in response to the solicitation requirements. The DynCorp QASP was evaluated and incorporated into the contract by ACC-APG as Attachment 0012 at the time of contract award on 20 December 2010. It is also the understanding of ACC-RI that ACC-APG further notified DCMA of the existence of the QASP when requesting DCMA delegation, but verification would have to come from ACC-APG.

ACC-APG formally delegated and DCMA-A formally accepted contract administrative responsibility with functions that primarily focus on contract oversight. Duties delegated to DCMA-A include property administration; ensuring the contractor is in compliance with contractual quality assurance requirements; reviewing, approving or disapproving, and maintaining surveillance of the contractor's purchasing system; consenting to the placement of subcontracts; assigning and performing supporting contract administration, to include the appointment of Contracting Officer Representatives (CORs); performing surveillance of contractor compliance with trafficking in persons requirements; approving other direct costs purchase requests; and establishing and implementing a system to monitor the contract specified Level of Effort.

Paragraph 2 on Page 14 of the report states, "The contracting officer stated for a contract like the ANP training contract,

using a quality assurance surveillance plan in conjunction with the SOW would be a more appropriate oversight methodology." The current ACC-RI Procuring Contracting Officer (PCO) confirmed with the previous ACC-RI PCO and neither recall ever making this statement. The previous PCO recalls discussing that a QASP existed on this contract, however DCMA-A developed numerous detailed audit checklists for COR surveillance based on critical SOW requirements. DCMA-A has indicated they must adhere to its Theater Quality Plan (TQP) for surveillance of the contractor. The TQP deviates from the QASP by utilizing tailored audit checklists. The DCMA-A lead quality assurance representatives (QARs) are responsible for updating the audit checklists used for performance surveillance and have access to all contract documents.

Adequate contract oversight is always a concern of the PCO, in part due to the continued rotation of TPSO and DCMA-A staff and now more so as troop strength decreases in accordance with the Presidential drawdown. ACC-RI has been actively engaged with DCMA-A and TPSO on oversight and will continue this dialog to strengthen contract oversight, to include ensuring that the audit checklists are updated and accurate. Furthermore, ACC-RI has always provided DCMA-A with an updated SOW after every SOW change request and Notice to Proceed (NTP) issued. Further discussions regarding the current process and oversight strategy resulted in DCMA-A agreeing with ACC-RI on 19 March 2013 to now update the audit checklists with every SOW change. ACC-RI has also added the lead QAR directly to the distribution of any changes to ensure that the audit checklists are updated expeditiously.

A.2.b.: ACC-RI has been coordinating with DCMA-A on this issue for nearly a year and the situation has improved. DCMA-A has agreed to issue Corrective Action Requests (CARs) for individual Internal Corrective Action Requests (ICARs) that go unresolved or have slippage past 30 days. Additionally, ACC-RI has been coordinating with DCMA-A to ensure that DCMA-A is providing copies of all CARs to the Contracting Office. As of 27 March 2013, there were only 7 open ICARS, and none of them have slipped past their revised Correction Action Plan (CAP) due dates. ACC-RI will continue to follow up with DCMA-A monthly on the current status of all open CARs and ICARS to ensure that any issues are being properly addressed and the contractor is held accountable. To ensure this review is completed monthly, ACC-RI will add it to the agenda for the biweekly Government telecons

held between ACC-RI, TPSO, and DCMA-A and request DCMA-A submit updated CAR and ICAR trackers prior to the meeting.

[REDACTED]



Inspector General Department of Defense

